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DEPARTMENT OF THE INTERIOR

FINAL
ENVIRONMENTAL STATEMENT

PLANET TOWNSITE

Prepared by

BUREAU OF LAND MANAGEMENT
DEPARTMENT OF THE INTERIOR

INT FES 77-2

Gust Berkland.
DIRECTOR

Cover: The oblique aerial photo on the cover shows the area under consideration in this document. The photo was taken in September 1972, looking north. The farmland in the lower right portion of the photo is the present Planet Ranch. The Bill Williams River flows from right to left. Castaneda Wash can be seen near the center. The lower portion of the wash is also being farmed.

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SUMMARY

() Draft

(x) Final Environmental Statement

Department of the Interior, Bureau of Land Management

1. Type of action: (x) Administrative () Legislative

2. Brief Description of Action:

The applicant proposes to exchange 1,280 acres of private land for 1,080 acres of public land in Mohave and Yuma Counties, Arizona, for the development of a private recreation/retirement community. The proposed development may house 500 families on a total area of approximately 8,660 acres.

3. Summary of Environmental Impacts and Adverse Environmental Effects:

The proposed new town development of 8,660 acres will have a probable impact on the following: (1) Possible minor change in climate, (2) partial change of vegetation, (3) soil, (4) elimination of livestock grazing, removal of wildlife, (6) recreation, (7) water, (8) air, (9) visual, (10) economic, (11) increase in the potential for man-caused accidents.

The impacts considered to be adverse concern vegetation, soil, water, air, wildlife, grazing, visual, and noise.

4. Alternatives Considered:

- a. No action
- b. Modify exchanges
- c. Public acquisition of private and State lands
- d. Direct sale of land

5. Comments have been requested/received from the following:

See Appendices E and F.

6. Date Statement Made Available to CEQ and the Public:

Draft Statement: March 29, 1973

Final Statement: June 17, 1977



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I. Description of the Proposal

Purpose of the Action

The purpose of this statement is to analyze the probable environmental impacts of a proposed land exchange with Arizona Ranch and Metals Co. as required under the National Environmental Policy Act (P.L. 91-190). The lands involved are in Mohave and Yuma Counties, Arizona (maps 1 and 2). No environmental impacts will result directly from the land exchange, but changes in land use, made possible by the exchange, could bring about significant changes in the natural environmental, human activities, and living patterns.

To accomplish the exchange, the Bureau of Land Management (BLM) is required to reclassify the Federal land for disposal. If the decision to classify some or all of the public land for exchange is made based on this environmental statement and other considerations, a proposed classification will be issued pursuant to 43 CFR, Part 2450, and BLM will invite interested parties to comment on the proposed classification.

Description of the Action

After the Planet Townsite Draft Environmental Statement was issued on March 29, 1973 and public comments were received, Arizona Ranch and Metals Co. reported to BLM that it had revised its original plans and proposed to develop a community of 500 homesites (instead of 7,000) on an area of 8,660 acres (instead of 11,980 acres). This change in plans would reduce its request for classification of national resource lands (NRL) to 1,080 acres (instead of approximately 9,646 acres in its original request). This final environmental statement will analyze the reduced homesite development.

The original exchange proposal included 1,080 acres of private lands located adjacent to the Havasu National Wildlife Refuge which could be exchanged for inclusion in the refuge area. The present proposal eliminates any exchange to the Fish and Wildlife Service.

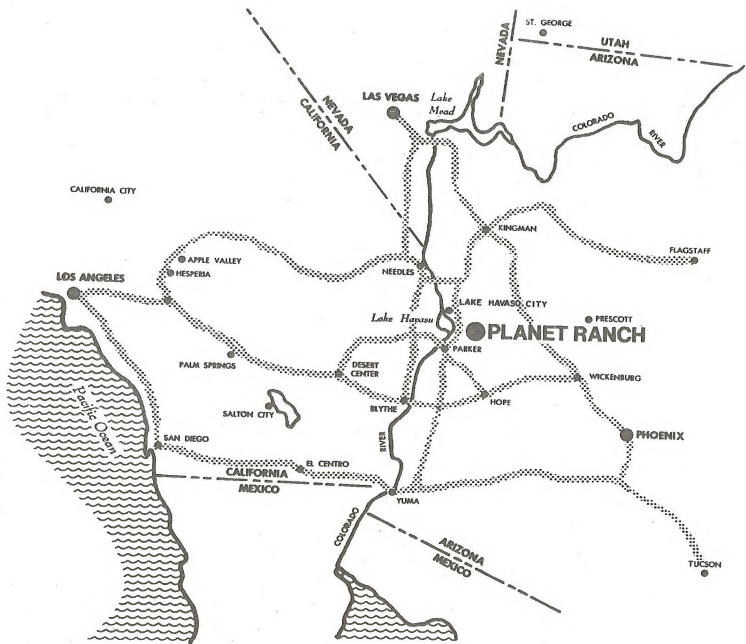
The Arizona Ranch and Metals Co. of Salt Lake City, Utah, and Parker, Arizona owns about 10,000 acres of land along the Bill Williams River. Intermingled with these lands are State and NRL administered by BLM (map 2). The proposed development on these lands would be for homesite development.

The environmental analysis in this statement is based on the development of a low density community with the following features (map 3).

1. All urban development would be located on about 8,500 acres of benchlands along the Bill Williams River and east of Mohave Wash. Residential development would not be allowed in the washes or floodplain. The development would consist of low density, single family dwellings on 5-acre sites. The Bill Williams River floodplain and the wash bottoms would be preserved as greenbelt and open spaces for ranch and farm

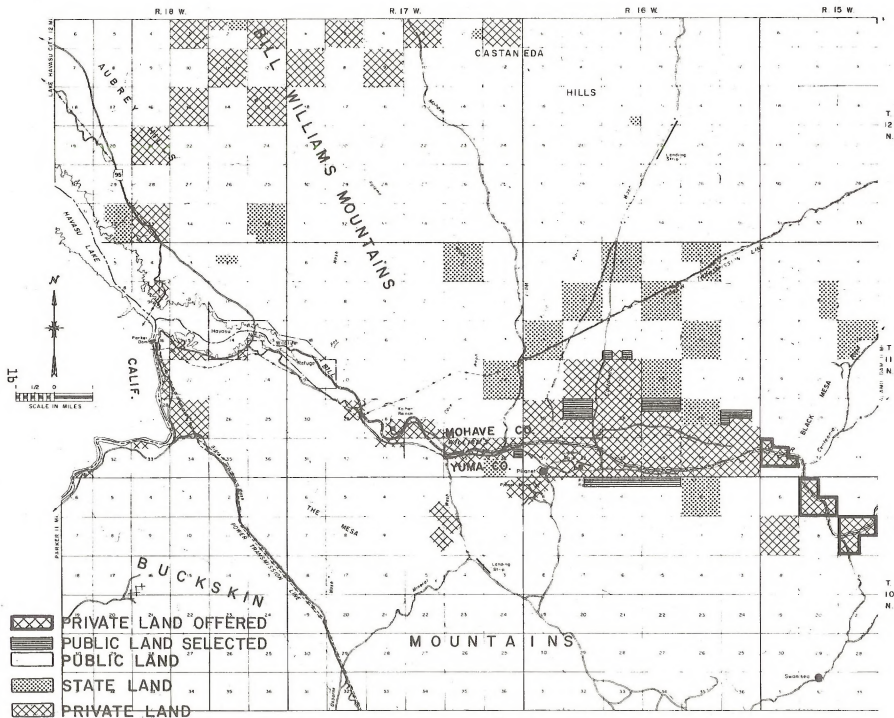
GENERAL LOCATION

MAP I



PRESENT LAND STATUS

MAP 2



MAP 3

PROPOSED 500 HOMESITE DEVELOPMENT

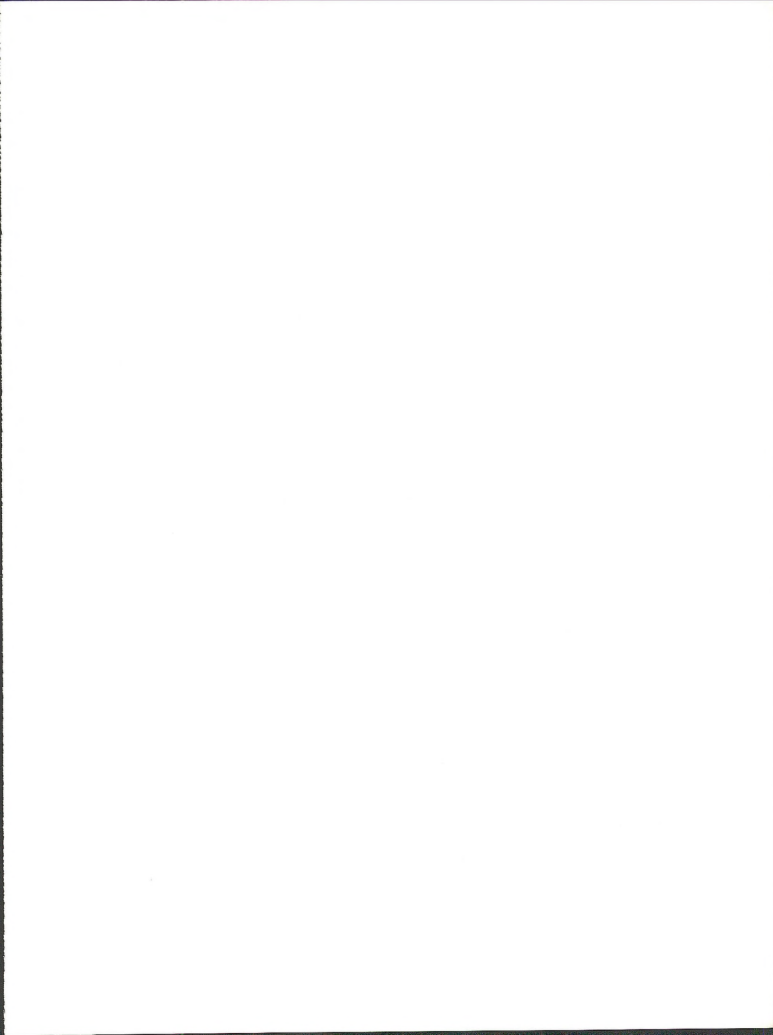
Planet Ranch

DEVELOPER: ARIZONA RANCH AND METALS COMPANY
ENGINEER / LAND PLANNER: TRICO INTERNATIONAL, INC.

LEGEND

-  EXISTING CREEK
-  PROPOSED LINES AND BOUNDARIES
-  8-MILE EXISTING RAIL CORRIDOR
-  RANCH OPERATIONS AND LANDS (100,000 AC)
-  RANCH AND FUEL PLOTS
-  PLOTS TO BE DRAINAGE
-  PLOTS TO BE DRAINAGE
-  24-KW POWER RANCH ROAD
-  24-KW POWER RANCH ROAD
-  24-KW POWER ACCESS ROAD
-  24-KW POWER DRIVE
-  24-KW POWER DRIVE
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SCALE IN MILES



activities of the company. No chemical eradication of phreatophytes is contemplated. Existing north-south drainages would be utilized for flood control. One wash would be rerouted into Castaneda Wash. Minimum land clearing is planned. Deed restrictions would be used by Arizona Ranch and Metals Co. to control architectural design of private developments and prevent further subdivision of lots.

2. An equestrian center, lodge and 9-hole golf course are planned. Irrigated pasture in the river floodplains would be increased from approximately 1,100 acres to 2,000 acres.

3. Arizona Public Service would supply electricity from the 69 kv line at Mineral Wash which currently services the Planet Ranch. This line is adequate for the development planned.

All service lines in the development would be placed underground. Arizona Ranch and Metals Co. plans an all-electric community, but if natural gas is needed and available, it could be piped from an existing gas line approximately 4 miles east of the townsite. The gas line would parallel an existing power line eliminating the need for new access or land scarring.

4. The existing access road up the Bill Williams River and the secondary and primary roads in the townsite would be paved. No road improvement, either north or south of the townsite, is planned. All roads within the townsite would be deeded as public rights-of-way. No use of the existing dirt landing strip north of the Planet Ranch is planned (map 2).

5. Arizona Ranch and Metals Co. plans to continue its present livestock operation on the Planet Ranch and associated Federal range allotment. An 100-foot wide livestock right-of-way would be provided on the east side of Castaneda Wash.

6. Land owners would develop individual septic tank systems. A sanitary landfill for solid wastes is planned north of the townsite. The site has not been identified.

7. Domestic water would be pumped from wells in the Bill Williams River floodplain to a series of low profile storage tanks located at the northern limits of the development.

8. Sand and gravel for construction would be obtained from townsite lands.

Arizona Ranch and Metals Co. plans to sell the homesites through interstate sales. Such sales would be made in accordance with Public Law 90-448 (Interstate Land Sales Full Disclosure Act).

If the contemplated exchange is consummated the patents (deeds) issued by BLM would not contain any covenants governing the use to which the lands would be put or the terms and conditions of such use. Nothing in the patents would require the company to develop the lands according to its plans nor would they prevent the company from selling all or part of the lands to others.

If the desired consolidation is to be accomplished by exchange, the company would offer to the United States at least an equal value of lands that would be suitable for management of Federal programs.

The private lands offered by Arizona Ranch and Metals Co. contain 1,280 acres (map 2). These lands are upstream from the proposed townsite and encompass approximately 4 miles of the Bill Williams River. The prime value of the offered lands to the BLM programs would be for the use of wildlife. These lands have potential for development and maintenance of riparian habitat for doves, waterfowl, small game, deer, and bighorn sheep. Water in the Bill Williams River is controlled by the Alamo Dam and is free flowing when released from the dam or when storms occur below the dam. There are year-round subsurface water flows along the river that can be developed.

Federal acquisition of these offered lands would also consolidate Federal ownership, assuring bighorn sheep access between their habitats north and south of the Bill Williams River.

During preparation of this environmental statement it was necessary to determine the likely consequences of the classification and transfer of the lands to the Arizona Ranch and Metals Co. Many environmental impacts were not specifically researched, but due to the knowledge, expertise and experience of BLM with similar actions on desert land, the statement often contains positive statements on various environmental impacts on the human environment.

II. Description of the Environment

Introduction

This section of the statement discusses the present environmental conditions of the proposed townsite and the surrounding area.

Climate

The subject lands are located in the southwestern desert region which is characterized by extremely hot summers, mild temperate winters, low rainfall, low relative humidity, and a long growing season. The townsite and the impacted area encompass what is termed the low desert and the medium-high desert. The low desert is found primarily along the Colorado River, extending 10 to 15 miles on either side at elevations of 450 feet to 1,000 feet above sea level. The medium-high desert extends from the 1,000-foot elevation to approximately 5,000 feet. The proposed townsite is to be located in the low desert zone.

The low desert zone has mean daily temperatures in July between 106° and 108° F, with highs ranging from 115° to 125° F. There are approximately 100 days per year with means temperatures over 100° F. The average low winter temperature is about 37° F with lows of 13° F on record. The average growing season is approximately 270 days. Freezing temperatures rarely exceed 10 days per year, occurring between December 1 and February 15. The medium-high desert zone has wider variations in temperature. Summer highs range from approximately 115° to 117° F, with approximately 110 days above 90° F. Lows average in the high 60s. Winter highs range between 60° and 70° F, with lows averaging 28° to 32° F. There are usually 80 to 85 days with freezing temperatures during December, January, and February with occasional lows of 0° F recorded throughout the zone. The growing season is approximately 240 days.

The average rainfall is about 6 inches per year in the townsite area. Approximately 60 percent of this precipitation results from winter storms, and the remainder from summer cloudbursts. The mean annual evaporation is approximately 80 inches. The results of this combination are reflected by vegetation that can survive in soils that are extremely dry for long periods of time.

Unequal heating and cooling of the ground surface generates a mountain-valley wind system which acts in conjunction with wind channeled through mountain passes and the river valley.

Vertical temperature profile decreases 4° to 5° F for each thousand foot increase in elevation. In summer there is a surface-based radiation inversion in the early morning hours which is related to the lighter winds and clear skies. The winter temperature profile does not show this early morning inversion due to strong northerly winds aloft.

Relative humidity varies from 10 percent to 40 percent in the summer and 25 percent to 50 percent during the winter. The amount of water vapor normally changes very little throughout the day because the oscillation of relative humidity is largely due to change in temperature.

Adverse climate elements include the long hot summers from May through the first part of October and the low, undependable precipitation that is sometimes accompanied by intense storm flash flooding and high winds. These adverse factors are partially offset by the long growing season and by the mild temperatures during the winter months.

Vegetation

Plant species associated with the Planet Townsite are typical of those species found in the Sonoran Desert. The Lower Colorado Valley vegetative subdivision of the Sonoran Desert occurs primarily along the lower part of the Bill Williams and Colorado Rivers. Riparian vegetation along the Bill Williams River near the proposed townsite includes arrow weed, cattail, and bullrush, as well as luxuriant stands of Fremont cottonwood, salt cedar, Athel tamarisk, and willow. (A more complete list of vegetation is found in appendix A.)

The plant species found on the townsite are representative of the Arizona Upland vegetative subdivision. Plant species include creosote bush, palo verde, mesquite, ironwood, ocotillo, saguaro, teddy bear cholla, and smoke tree.

There are few perennial grasses or forbs on the area, but extra winter or summer precipitation can result in abundant ephemeral vegetation. Following these periods of precipitation annuals such as filaree, Indian wheat, six weeks grama, three awn, six weeks needle grama, and six weeks three awn will fill much of the normally barren interspaces between the perennial shrubs and trees.

Soils

The soils are well drained, moderately to slowly permeable, very deep, fine textured sandy loam with a surface cover of desert pavement in some areas. The soils are relatively young and show very little horizon development. There is very little evidence of active wind or water erosion on the numerous flat ridges in the area. The erosion potential is moderate.

Topography

The proposed Planet Townsite lies on a gently sloping alluvial fan, draining south-southwestward to the Bill Williams River which forms the townsite's southern boundary (topography--map 4).

Six large washes and several dozen smaller washes are incised into the surface of the fan, resulting in a series of alternating flattop ridges separated by parallel dry washes. The largest of these, Castaneda Wash, is nearly one-quarter mile wide and has cut

R. 17 W.

R. 16 W.

R. 15 W.

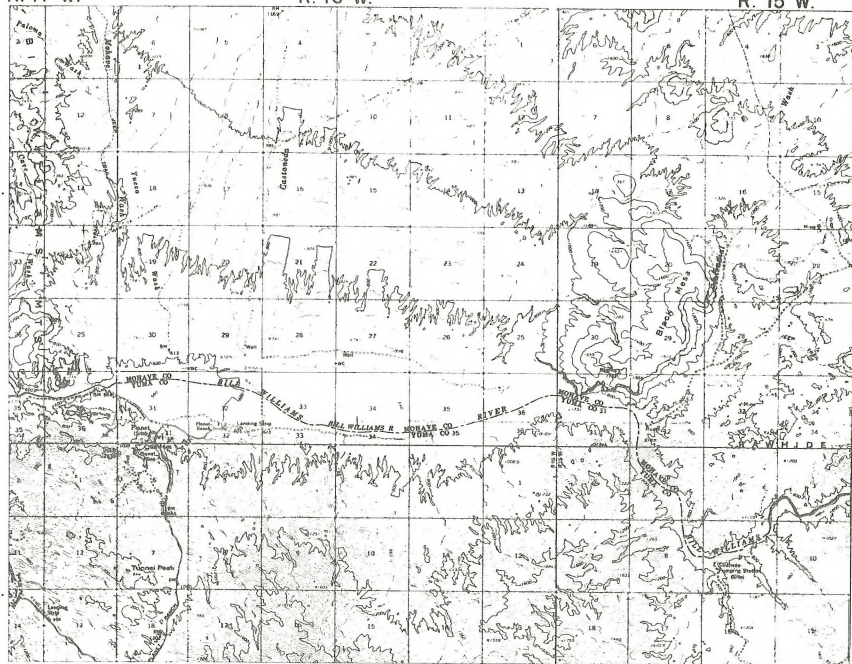
TOPOGRAPHY

MAP 4

T. 11 N.



T. 10 N.

Scale $\frac{3}{4}$ " = 1 Mile



as much as 80 feet into the alluvium. Most washes, however, are much smaller and correspondingly shallower.

Elevations of the proposed townsite vary from approximately 1,400 feet along the north, to below 600 feet along the Bill Williams River. There is an average gradient of approximately 2 percent. The only steep slopes encountered on the lands are those forming the banks of the washes.

Other lands in the proposed exchange area lie between 700 and 800 foot elevations on the south bank of the Bill Williams floodplain. This is a rough badlands area where a series of dry canyons spill out onto the floodplain along the main river channel.

The terrain surrounding the townsite is generally much higher and rougher. On the west are the Lower Chemehuevis and Bill Williams Mountains, to the south the Buckskin Mountains, and on the east the Black Mesa and the Rawhide Mountains. To the north the fan continues for a few miles, becoming increasingly rougher, until it blends into the foothills of the Mohave and McCracken Mountains.

Geology

Although various bedrock units are exposed nearby, the entire surface and upper subsurface portions of the townsite lands are composed of poorly sorted alluvium of Quaternary-Tertiary age.

This sedimentary material has been deposited as an alluvial fan by erosion from the surrounding mountains. The result is a thick blanket of silt, sand, and gravel-sized material obscuring all rock types and possible mineralization below. The thickness of this material could range from a few hundred feet to over 1,000 feet. No well log information is available. Surface drainages have cut channels at least 80 feet in depth across the fan material, yet none have gone deep enough to expose bedrock.

Various older geologic formations seen on adjacent lands are presumed to underlie the alluvial fan. Included are Precambrian gneiss and a Paleozoic complex made up of thin beds of limestone and shale with amphibolite, quartzite, hornfels and quartz-sericite schist.

Tertiary age volcanic rocks may also be found underlying the fan. Basalts, with associated tuffs and agglomerate, occur in the area, specifically in the vicinity of Black Mesa just east of the subject lands.

Structural information is scanty. Faults separate the mountainous areas where older geologic units are exposed from the basin areas, where transported alluvium covers everything. The majority of these are probably normal faults, though reports of thrust faults in adjacent areas are found in the literature. None are recently active. The area has not been a center of historical seismic activity.

Water

During 1962 the Arizona Ranch and Metals Co. had a water investigation made by Samuel F. Turner and Associates.¹ Much of the following information is taken from Turner's report which was updated by letter, dated October 13, 1971.

There are five sources of groundwater in Planet Valley:

1. Recharge from flood flows of the Bill Williams River.
2. Underflow from the Bill Williams River.
3. Underflow from the north and south.
4. Recharge back to groundwater reservoir from irrigation use.
5. Recharge from precipitation on the valley.

Turner estimates that a minimum of 23,000 acre-feet (acre-ft) of groundwater could be pumped annually without exceeding the annual groundwater recharge. This amount is adequate to furnish water for 500 families (1 acre-ft per family) and 2,000 acres of irrigated crops (6 acre-ft per acre).

The wells are from 50 feet to 110 feet deep. Water is expected to be of satisfactory quality with total dissolved solids (TDS) of 271 to 369, fluoride content of 1.1 parts to 1.2 parts per million (p/m), and a boron content of 0.5 parts per million.

Over a 26-year period the Bill Williams River flow has averaged 62,330 acre-feet per year. The river runs into the Colorado River at Lake Havasu just above Parker Dam. Water from the Bill Williams River is not part of the Colorado River adjudicated waters (appendix C). The Bill Williams River was erratic in flow and flash floods were common. The Alamo Dam, built in 1968 and operated by the Corps of Engineers as a flood control structure, is located approximately 20 miles east of the proposed townsite. The dam has reduced the danger of flooding by providing a more even recharge to the underflow of the Bill Williams River.

¹appendix D, list of references, item 2

Surface flow normally is not steady in Planet Ranch Valley east of the north-south township line separating Rs. 16 and 17 W. During normal years a sustained surface flow occurs for at least part of the year downstream from the narrows which is located one-quarter mile below the township line. The surface flow varies both by the time of year and location, but is probably 4,000 to 7,000 acre-feet per annum in the middle and lower ranch area.

Consumptive uses of waters at the Planet Ranch include domestic use, stock watering, evaporation, irrigation, and phreatophyte plant use. Water in underground storage would be available for use during drought years. In the Planet Valley, that portion of the Bill Williams River and its floodplain within T. 11. N., R. 16 W. lying immediately south of the proposed townsite, the depth of recent fill averages 86 feet. By lowering the water table 30 feet this fill should produce 22,000 acre-feet of water. An additional 22,000 acre-feet should be available within this same 30-foot horizon in the Pleistocene fill to provide a total of 44,000 acre-feet. Recent fill in the lower and middle ranch area should provide 6,300 acre-feet of water from 30 feet of drawdown, making a total of 50,300 acre-feet of water storage for drought years (appendix J).

The climate and vegetation in the desert causes much of the rain that falls to end up as runoff or surface flow. The runoff figures on the following table are calculated for the maximum probable storm for a 100-year period, a 10-year period, and a 2-year period.

Rainfall Intensity--Runoff Table

| <u>100-yr. storm period</u> <u>rainfall</u> | <u>drainage area</u> <u>breakdown</u> | <u>runoff</u> <u>acres</u> | <u>acre-ft</u> <u>total runoff</u> |
|--|--|-------------------------------|---------------------------------------|
| 8 hrs. = 3.0 in. | Mohave Wash | 153,500 | 11,500 |
| 1 hr. = 0.375 in. | Castaneda Wash | 32,500 | 6,200 |
| $i_e = 0.113$ in/hr | Remainder | 200,000 | 15,000 |
| | Total | 386,000 | 32,700 |

A = area in acres

$Q = i_e A$

10-yr. storm period

| | |
|----------------------|----------------|
| <u>rainfall</u> | |
| 8 hrs. = 1.8 in. | Mohave Wash |
| 1 hr. = 0.54 in. | Castaneda Wash |
| $i_e = 0.0675$ in/hr | Remainder |
| | Total |
| | 6,900 |
| | 3,700 |
| | 9,000 |
| | 19,600 |

2-yr. storm period

rainfall

8 hrs. = 1.1 in.

1 hr. = 0.1375 in.

 $i_e = 0.0412$ in/hr

Mohave Wash

Castaneda Wash

Remainder

Total

4,200

2,300

5,500

12,000

Alamo Dam controls all but 726 square miles of the Bill Williams River watershed; 77 percent of the water from this uncontrolled area enters Planet Valley from the north.

During 1971 the Corps of Engineers, Los Angeles District, conducted a flood hazard evaluation of the Arizona Ranch and Metals Company's Planet Ranch. Estimates of peak flood discharges are listed below.

Peak Discharge Table

| <u>concentration point and location</u> | <u>area (sq mi)</u> | <u>SPF**</u> | <u>peak discharges:cfs</u> | |
|--|-------------------------|--------------|----------------------------|---------------|
| | | | <u>100 yr.</u> | <u>50 yr.</u> |
| 1. Bill Williams River at downstream limit of townsite | 726* | 120,000 | 52,000 | 29,000 |
| 2. Bill Williams River at upstream limit of townsite | 233* | 110,000 | 46,000 | 26,000 |
| 3. Mohave Wash at confluence with Bill Williams River | 268 | 75,000 | 32,000 | 18,000 |
| 4. Castaneda Wash at confluence with Bill Williams River | 93 | 45,000 | 22,000 | 16,000 |

The Corps of Engineers stated that a potential exists for serious flood damage to life and property within the floodplains of the Bill Williams River and tributary washes. However, the proposed plan does not contemplate any structures on the floodplains.

*excludes tributary area upstream of Alamo Dam

**standard project flood--(maximum flood that could possibly occur)

Air

The air quality in and adjacent to Planet Ranch is of relatively high quality. The Environmental Protection Agency (EPA) has designated this area Class II in which slight deterioration, which normally accompanies moderate well-controlled growth, is considered insignificant.

The area is usually smog free and generally meets the national and state ambient air quality standards. Of the six regulated pollutants--sulphur dioxide, carbon monoxide, photochemical oxidants, hydrocarbons, nitrogen oxides and particulate matter--only particulate matter standards are occasionally exceeded. The Arizona 24-hour allowable maximum for particulate matter is 100 micrograms per cubic meter of air, and the national secondary standards for the annual geometric mean is 60 micrograms per cubic meter. Dust, caused by blowing winds, will exceed the standards for short durations during wind storms. The farming operation and vehicle use also contribute to the dust. The generally poor condition of the roads limits the amount of travel and associated dust in the area.

The present background level of particulate matter in the proposed townsite area is estimated to range between 26 and 35 micrograms per cubic meter of air.

Aesthetics

The townsite is relatively uncluttered with visual intrusions. One high voltage power line crosses the northern portion of these lands from east to west (Bureau of Reclamation, Parker Dam-Bagdad Line).

The visual qualities of the features surrounding the site are exceptional. The Bill Williams Mountains, Aubrey Peaks, and Rawhide Mountains offer scenic backdrops to the east, north and west. Green irrigated fields in the bottomlands form the scenic foreground, and the Buckskin Mountains form the background to the south. The Buckskin Mountains in and around the Planet area have been disturbed by mining exploration and development, but these disturbances do not detract from the overall scene.

The Bill Williams River Canyon below Planet Ranch is one of the most scenic areas in western Arizona. Here the irrigated fields and riparian vegetation of the bottomlands break quickly into steep canyon walls. Visual pollution occurs here in the form of two power lines. The road up the canyon bottom does not significantly detract from the visual scene.

Noise

Noise pollution is not significant on or adjacent to the proposed townsite. Noise is limited to the normal operation of ranching, irrigation, and vehicle traffic. A maximum of 25 vehicles are estimated to use the area per day. Present noise is neither disturbing nor distracting. It is doubtful that noise levels ever exceed 50 decibels except near operating farm equipment and well pumps or during natural weather disturbance phenomena.

Land Use

No urban-suburban uses exist on the proposed townsite or adjacent lands. The townsite is in a virtually undisturbed natural condition except for a high tension power line, service road, and a county highway. The residences and farm buildings of the Planet Ranch headquarters are located on the bottomlands in Section 32. There is also a small ranch house located downstream in the NW^o of Sec. 35, T. 11 N., R. 17 W. G&SRM.

There are some urban influences on this area from Lake Havasu City, the Parker Strip, and Parker. As more people use these areas, some will also visit the Planet Ranch area on the Bill Williams River. Parker and Lake Havasu City have commercial shopping facilities within a 1-hour drive from the townsite.

The commercial transportation system consists of bus facilities at Parker and the two 6,500-foot paved landing strips at Lake Havasu City. Arizona State Highway 95 connects Parker and Lake Havasu City. Yuma County has constructed a graveled road along the Bill Williams River up to Mineral Wash, about 4 miles west of the townsite. A well-used ranch road connects this road with the Mohave County road that begins at the north side of the Bill Williams River, traverses the townsite from south to north, and joins the Mohave County Yucca-Alamo Dam Road.

The Bureau of Reclamation has a large transmission line (Parker Dam-Bagdad Line) that crosses the townsite. El Paso Natural Gas has a large natural gas pipeline 4 miles east of the proposed townsite. Presently there are so few human inhabitants that solid waste is not a problem and is disposed of in small ranch dumps.

The Four Corners Regional Commission has proposed the construction of a highway along the north side of the Bill Williams River from Lake Havasu to Alamo Dam and then to Highway 93 near Date Creek. This highway would be part of a proposed effort to create "a better connection between Central Arizona and the Colorado River Zone". The commission was established to provide

economic assistance to impoverished Indians of Arizona, New Mexico, Colorado, and Utah. A preliminary plan for major road construction was prepared in 1969. Highway construction between the Planet Townsite and Lake Havasu consequently may be more dependent upon acceptance of the Commission's plan than upon the applicant's proposal.

Livestock Grazing

All public lands included in and surrounding the proposed townsite are presently open to livestock and are allotted to the Arizona Ranch and Metals Co. The average grazing capacity of the public lands is approximately two cattle yearlong per section, amounting to 18 animal unit month of feed (AUMs) on the one and one half sections involved in the proposed exchange. However, droughts sometimes limit annual forage production below the average grazing capacity. Most grazing occurs in the washes.

Wildlife

The general desert region within the watershed of the Bill Williams River contains important wildlife values. The habitat ranges from river delta lands to barren rugged mountains. Species lists have been compiled to identify amphibians, reptiles, mammals, and birds normally associated with the region (appendix A). Wildlife population data are limited or nonexistent for most of the area. Riparian plant species are profuse and serve as a natural habitat for various wildlife forms near Planet Townsite along the Bill Williams River.

Four species of mammals are considered to be of special significance to the region. These are the desert bighorn sheep, desert mule deer, antelope, and feral burro. Each of these may be expected to frequent the townsite but cannot be considered permanent inhabitants.

Use by these species is probably highest during years of above normal precipitation and at times when forage is so abundant that these wildlife species stay in the area longer than usual. Bighorn sheep rams may cross the area in search of ewes during the mating season. Increased use by wildlife may also occur in the desert washes when succulent vegetation is more profuse following seasonal runoff. Each wash serves as a natural route from the river bottoms to higher elevations to the north for deer and bighorn sheep.

A Mexican subspecies of the American antelope (Mexican pronghorn) occurs within the area. This antelope ranges from the vicinity of Lake Havasu City south and east to the Rawhide Mountains-Aubrey Peaks area. Observations of this species reveal intermittent use of the alluvial fans and sandy slopes, washes, and rocky hills of the region.

Other mammalian species that occur on the townsite or adjacent river lands include Yuma lion, coyote, badger, gray fox, bobcat, beaver, striped skunk, spotted skunk, black tail jackrabbit, and desert cottontail rabbit. Densities on the uplands are low because of the dry condition and sparse vegetation. A variety of rodents, including squirrels, mice, and rats are also found on the area.

Habitat attractive to wild bird populations is abundant along the Bill Williams River and delta. Most species identified as occurring within the region may be expected occasionally on the townsite. Gambel's quail are common, but numbers vary with nesting success which is correlated with seasonal moisture and vegetative production. Mourning doves are common to abundant except during the winter months.

No concentrations of wildlife have been noted on the proposed townsite and no critical habitat for wildlife has been identified, except as these lands contribute to the overall habitat utilized by the Mexican antelope.

Private lands within the river floodplain have been developed for livestock pasture. These pasture lands are used intermittently by big game, upland game, and waterfowl. During the winter months 200 to 400 geese use these pastures. The lush vegetation and available water within the floodplain provide nesting habitat and serve to concentrate flights of mourning doves and whitewing doves. Substantial numbers of waterfowl use open water areas from the vicinity of Planet Ranch downstream to and including Havasu National Wildlife Refuge.

There are two beaver ponds in the Bill Williams River just west of the Planet Ranch headquarters. These ponds help concentrate waterfowl populations. The endangered Yuma clapper rail has been found along the Bill Williams River at certain times of the year; there is no evidence of recent use of the proposed townsite by the rail.

The Havasu National Wildlife Refuge is downstream (west) of the proposed townsite. The refuge encompasses the Bill Williams River and floodplain, and provides habitat for numerous and diverse wildlife species.

The townsite lands contribute to the entire ecosystem of an extensive desert region important for many species of wildlife. Density of wildlife species is low, however, use of these lands is related to the natural movements and life habits of all species frequenting the region. The importance of the area for wildlife cannot be measured solely by its resident wildlife. Ecologically, the naturalness of the region is uninterrupted and almost unimpaired by human disturbance. Life forms have not been displaced to any measurable degree.

Watershed

The townsite area does not yield much water or vegetative production because of its small size and low precipitation. Natural or geologic erosion occurs throughout the area, but there is little evidence of accelerated erosion by either wind or water. The small washes have some vegetation including grass in the bottom, and desert pavement protects the flat ridges between washes. The majority of the runoff through the area comes from the upper watershed where higher elevation and precipitation produce greater runoff.

Recreation

At present the public, State, and private unfenced lands on the site are open to general public use. Private fenced lands within the proposed townsite area are posted against hunting or trespassing without permission.

In general, two types of land areas are involved in recreation use: (1) uplands and (2) bottomlands.

Upland areas have lower scenic qualities and fewer opportunities for recreation. There is some rockhounding and small game hunting, with use estimated at less than 500 visitors per year. The Planet to Yucca road passes through the upland area and provides access to other areas of higher recreation potential. The uplands have some on-site value as open space.

Bottomlands, including natural riparian vegetation and irrigated lands, hold a variety of high quality recreation opportunities, including hunting (waterfowl and small game), nature study, sightseeing and camping, and have exceptional scenic qualities. These lands draw an estimated 10,000 visitors per year, mainly sightseers and those driving for pleasure along the county road paralleling the Bill Williams River.

Off-site public, State, and most undeveloped private lands are open to general public use. A number of areas have been dedicated and are being managed for recreation and wildlife. Other areas offering significant recreation opportunities are:

1. Bill Williams Mountains

This 30,000-acre mountain area immediately west of the proposed new town development has lands free from formal roads or other man-made disturbances and has a potential for a BLM Primitive Area designation. These mountains are bounded by Mohave Springs Mesa on the north and the Bill Williams River on the south. The United States Fish and Wildlife Service has a pending application on a portion of this area for expansion of the Bill Williams Unit of the Havasu National Wildlife Refuge.

2. Old Planet Townsite Ruins

These ruins are located adjacent to and just south of the Planet Ranch. This site is adjacent to one of the first (1863) economical copper mines and smelters to be worked to any extent by Americans in Arizona. Very little remains on this site except for ruins of a few houses and the foundations of the smelter and office buildings. This site has not been proposed for inclusion in the National Register of Historic Places at this time.

3. Swansea Historic Complex (map 2)

This complex centers around an abandoned townsite established in 1909 and is located in Section 32, T. 10 N., R 15 W. It is in the middle of the largest copper producing area in Yuma County. The site is located approximately 8 miles by air southeast of the Planet Townsite and has remnants of numerous houses, the smelter housing, offices, and two cemeteries. The old Arizona and Swansea Railroad grade can still be traced from Bouse to Swansea even though the rails and ties have long been removed. Remnants of an old pumping station and waterline from the Bill Williams River to Swansea are also part of the complex and are located on private lands offered in the exchange. At this time this site is being nominated to the National Register of Historic Places.

4. Lake Havasu

This large body of water behind Parker Dam is located about 10 miles west of the proposed Planet Townsite. It provides approximately 30,000 surface acres for water-oriented recreational activities.

Most of the lands adjacent to Lake Havasu are dedicated to recreation and wildlife. The following is a breakdown of Arizona shoreline administration:

| | |
|---|----------|
| Havasu Wildlife Refuge (United States Fish and Wildlife Service) | 8 miles |
| Lake Havasu State Park (lease administered by BLM) | 34 miles |
| Bureau of Reclamation Security Zone (no recreation use) | 1 mile |
| Bureau of Land Management | 2 miles |

5. Parker Strip

This is a portion of the Colorado River between Parker Dam on the north and Headgate Rock Dam on the south near Parker (approximately 700 surface acres). The river is clear and deep and approximately 600 feet in width.

The Parker Strip is suitable for most water-related outdoor recreation activities. However, rapidly increasing use of the area for water skiing and boating reduces the suitability of the area for swimming and other nonboating activities.

The Parker Strip is highly developed for all types of uses. The Bureau of Land Management, private owners, Metropolitan Water District of Southern California, Colorado Indian Tribes, the Bureau of Reclamation, and others are involved here. Nearly all the shoreline is or will probably be developed for both private and public recreation.

6. Bill Williams Riparian Area

This area of less than 1,000 acres of land along the Bill Williams River has unique natural features. The majority of the riparian vegetation is within the Bill Williams Unit of the Havasu National Wildlife Refuge. The vegetation along the floodplain consists of cottonwood and willows, and, for most of the year, there is a live flowing stream. Wildlife in this area are numerous and diverse.

Exclusive of Lake Havasu and the Parker Strip, the off-site use is not excessive--probably less than 20,000 visitors per year. Access is not good, and pressure has not been heavy.

Lake Havasu and the Parker Strip present a totally different picture. Lake Havasu receives more than an estimated 1 million visitor days' use annually¹ which is not excessive for this large body of water. The Parker Strip, however, receives more than 4 million visitor days' use annually. Visitation to the "Strip" during peak use periods may exceed the resource capacity.

The study, "Recreation Uses of the Lower Colorado River Valley",² made by the University of Southern California Research Institute for Business and Economics, March 1967 to March 1968, provides detailed information on the recreational use of the Lower Colorado River from Davis Dam to the Mexican border. Since the study was made over a full 1-year period, it provides information on both the summer, or water-orientated visitor, and the winter, or primarily desert-oriented visitor, who stayed in the Colorado River Valley. The study estimates almost 6 million visitor days annually, of which almost 75 percent are concentrated on the Parker Strip (town of Parker upriver to Parker Dam). The study describes the Colorado River Valley as a yearlong recreation use area which appeals primarily to the young, active, water sports enthusiast during the summer and to those seeking a mild climate, economical shelter, and opportunities for sightseeing and fishing during the winter.

The London Bridge is located at Lake Havasu City and has an impact on the economy of the whole area. The bridge attracts more than 1 million visitors per year.

Minerals

Examination of the area and a review of geological and mining literature failed to disclose any evidence of either past or present mining or prospecting on the proposed townsite. Prospecting on some of the lands south of the river probably occurred during periods of mining activity at the old Planet Mine just south and west of the townsite. On five of the seven parcels of BLM land within the proposed townsite, the Government does not own the mineral estate. During a field examination no evidence of mineralization was observed on the other two parcels (Sections 4 and 5, T. 10 N., R. 16 W., and Section 36, T. 11 N., R. 17 W.).

¹visitor day = an aggregation of 12 patron hours, one or more persons to total 12 hours of use

²appendix D, list of references, item 5

Archeology

At the request of the Arizona Ranch and Metals Co., in August 1972, Prescott College conducted an archeological survey of 5,981 acres of Federal land selected in the original exchange (appendix H). This intensive survey identified six San Dieguito archeological sites (sleeping circles, rock workshops, rock alignments). Although not previously recorded in the area of the Planet Townsite, rock alignments and more than 8,000 sleeping circles have been recorded in southern Arizona and California.

Two historical sites have been identified near the townsite: Swansea and Old Planet Townsites. The Old Planet Townsite is located on private land and is not considered eligible for the National Register of Historic Places. Swansea townsite is located about 8 miles east of the proposed townsite on both Federal and private land. It is in the process of being nominated to the National Register of Historic Places. If exchange is completed, the Swansea Townsite will come under total Federal ownership. For this reason and because the proposed townsite will increase access to the site, a 106/2b statement of effect will be completed before the land exchange.

No known National Register sites exist on adjacent State or private land. However, BLM cannot conduct a cultural resource survey on non-Federal lands to determine cultural resources that may be present. If the data from the intensive survey of the Federal lands are used as a predictive sample, it appears unlikely that any sites of National Register quality exist on State or private lands. It is expected that any sites present will be similar to those already identified on Federal lands.

Both Yuma and Mohave Counties have ordinances, codes and regulations that are available for implementation and would affect development. A few of these would include zoning, subdivision sales disclosure laws (PL 90-448), subdivision ordinances, sewage and solid waste disposal, air and water quality regulations, and building, electrical, and plumbing codes. In the present undeveloped state, these controls have no impact. Without the proposed action, assuming minimal or no development of the transfer area lands, these controls do not have a significant effect. However, the controls do exist and any contemplated change in land use would be subject to such controls.

Mohave County's economy is closely tied to natural resource use. Grazing has traditionally been extensive in the county and it remains an important agricultural component. In recent years, some irrigated cotton and alfalfa operations have been introduced, but their production is minimal compared to other counties of Arizona. Mohave County is one of the few producers of molybdenum in the United States.

The leading retirement and recreation community in the county is Lake Havasu City, which began land sales in 1963. The new town's impact on the county is quickly seen by a review of population statistics. In 1960 Mohave County's population was 7,736, down 9 percent from 1950; in 1970 the population had increased to over 25,000, approximately 5,000 of whom resided in Lake Havasu City. The population of Mohave County in mid-1975 was estimated to be 36,000, with 9,600 to 10,000 people residing in Lake Havasu City.

The economy of the area is heavily dependent on leisure time activities such as entertainment, outdoor recreation and retirement living, especially along the river. It is the latter two activity groups which are river oriented. Persons primarily interested in spending their leisure time in casinos and entertainment activities are attracted to the Las Vegas area. (Any such activity along the river must be considered supplementary to other activity in the area.)

The following profile of outdoor recreation use and users is drawn from a study of the Colorado River from Davis Dam to the Mexican Border made by the University of Southern California Research Institute for Business and Economics. The study team interviewed visitors between March 1967 and March 1968.

The heaviest use of the river, approximately 72 percent, was in the vicinity of Lake Havasu City and Parker. The majority of visitors were over 35 years of age (34 percent were over 50 years of age) traveling in small family units (56 percent were couples alone).

The majority of visitors came from Southern California, 47 percent from Los Angeles and Orange Counties alone. An additional 9 percent came from Arizona, and another 9 percent from Nevada. Most people traveled to the area in a standard automobile, but approximately 9 percent came in four-wheel drive vehicles.

Eighty percent of the visitors had made previous trips to the area; 55 percent of them had made one or more trips to this same area the previous year. The majority of visitors stayed less than a week per trip, indicating mostly weekend use. However, 20 percent stayed between 12 and 39 weeks (over 39 weeks was considered permanent residency for the purposes of the study). Nearly 70 percent of the visitors brought their own accommodations with them in the form of trailers, campers or tents, although approximately 18 percent used commercial accommodations, the largest percentage of any area on the lower Colorado River. What they liked best about the area were (in order of response numbers): "warm weather, fishing, good people, scenery, place to relax, and not too crowded". What they would most like to see improved were (in order of response numbers): "more commercial facilities, improved restrooms, build a hospital, better camping facilities, and better recreational facilities". Less than one percent thought that more "private enterprise property to buy" was needed.

Activities engaged in by the visitors were (in order of response numbers): fishing, sightseeing, boating, (over half engaged in these activities), swimming, camping, water skiing, picnicking and hiking (at least 25 percent engaged in these activities).

A profile of permanent residences was compiled by a consulting firm in January 1970 from a series of interviews. Pages 21 through 24 are directly quoted from the resulting report.

The typical resident moved to the area within the last three years. The majority of residents interviewed, 71.7 percent, previously resided in California. However, the bulk of these (64.2 percent) were from Southern California, including about four percent from Needles.

An additional 18.9 percent were from Arizona and Nevada, and the remaining 9.4 percent were from such diverse areas as Oregon, Louisiana, Utah and Japan.

Two principal reasons given for moving to the Lower Colorado River Valley area were: "warm climate", or "getting out of the city congestion and smog". Of all reasons given, over 32 percent had some connection with the climate and location, and 29 percent were connected with flight from urban problems.

Approximately one-third of the heads of household interviewed were retired. Of those who were actually employed, almost 20 percent worked for the Santa Fe Railroad in Needles, while the majority of the remaining household heads were employed in other blue-collar occupations, particularly the construction trades. The principal places of employment were Needles, California and Bullhead City, Arizona.

The median age of respondents interviewed was 55 years. Median annual family income was \$9,450. The average household size was 2.3 persons and 62.3 percent of the households interviewed contained two persons.

Eighty-three percent of all households surveyed owned their homes. The estimated value of these homes (land and dwelling) ranged from \$10,000 to \$20,000 with a median value of just under \$16,000. It should be noted that 78 percent of the households interviewed were residing in mobile homes placed on lots purchased for this use, as opposed to being in a mobile home park with rental spaces; the balance lived in conventional single family dwellings.

Among the 17 percent of the households who were renting, about three-fourths paid rent ranging from \$100 to \$124 per month, with median rent being approximately \$110 per month. All of the families renting were housed in furnished quarters.

From the same report a profile of lot owners (without home development) was constructed.

The typical respondent owned an average of 1.6 lots. The range in parcels owned numbered from one to five.

Over one-half of the respondents indicated purchase of a lot for future personal use as follows: 43.3 percent for retirement; 13.4 percent for vacation home use. The other 43.3 percent of those interviewed acknowledged lot purchase for investment purposes.

Approximately twenty percent of the respondents indicated their lots were presently for sale because of recent illnesses and increased taxes. An additional thirteen percent of the property owners who bought more than one lot indicated that while one was being held for personal use, the others were purchased for investment purposes.

Those respondents planning to use their lot for a retirement home indicated an expected annual retirement income range of from \$4,500 to \$8,000. Respondents who had bought lots for purposes other than a retirement home indicated present annual incomes ranging from \$10,000 to \$18,000.

Approximately 23 percent of the household heads responding were retired. About thirty percent were employed in professional or managerial positions, with the remaining 47 percent in various other occupational categories, primarily blue collar and services.

The following description of Lake Havasu City is included because of its similarity to the possible results of the proposed action.

Lake Havasu City, Arizona

Lake Havasu City is located on the east side of Lake Havasu, a 45-mile long lake on the Colorado River.

Lake Havasu City is being developed as a "new town" on 16,150 acres bordering Lake Havasu in Arizona. Extensive commercial, industrial and recreational development has been undertaken on the property, with the primary industrial employment base being provided by the McCulloch Corporation, manufacturer of chain saws and outboard motors.

Recently, the McCulloch Corporation purchased the historic London Bridge for a reported \$2.5 million and a relocation cost of \$6 million. The bridge, which has been re-erected at the site, will become the focal point for a new multi-million dollar International Resort Center. Studies made for the developer relative to the impact of the bridge on Lake Havasu City estimate over 2.8 million persons will visit the bridge during the first year after its completion. In addition, community income of over \$28 million is expected.

To accommodate this influx, between 800 and 1,100 hotel and motel units are initially planned and new restaurants, shops and other service facilities are also anticipated. The developers report that they committed \$15 million for relocation of the bridge and construction of the International Resort Center. They also anticipate private investment of over \$35 million in satellite facilities.

Lake Havasu City is approximately 320 road miles east of Los Angeles, 240 miles northwest of Phoenix, and 150 miles south of Las Vegas. The development may be reached from the north via U.S. 95 south to U.S. 66, through Needles, California, and Topock, Arizona, to the junction with Arizona Highway 95 (10 miles east of Topock). Lake Havasu City is 21 miles from the Topock junction with Arizona State Highway 95.

From the east, Lake Havasu City may be reached via U.S. 66 west through Kingman, Arizona; to the junction with Arizona State Highway 95 (35 miles west of Kingman); from the west, by taking U.S. 66 east through Needles, California and Topock, Arizona, to the junction with Arizona State Highway 95 (10 miles east of Topock).

There is also an airport at Lake Havasu City for commercial and private airplanes.

Lake Havasu Marina is located on the peninsula in Lake Havasu State Park. Facilities include 200 slips, a launching ramp, floating fuel dock, and a complete range of related sales and service outlets.

Single family lots at Lake Havasu City vary in size from 10,000 to 20,000 square feet; prices range from about \$3,000 to \$30,000 with an average price of \$5,900. Apartment lots vary from one-half to one acre and sell for \$14,000 to \$47,000. It should be noted that there are no waterfront residential lots in the development.

Commercial lots are typically 50 feet by 50 feet (2,500 square feet) and are priced between \$9,000 and \$20,000. Industrial sites are all one acre in size and sell for \$25,000 per acre. Hotel/motel sites range in size from three-quarters to two acres and sell for prices ranging from \$30,000 to \$110,000. Mobile home sites are all 4,500 square feet and sell for between \$4,500 and \$8,500.

Of particular significance has been the addition of mobile home lots of (sic) the reduction of hotel/motel lots. The current offering of mobile home lots has been due to increasing demand for such lots; acreage formerly set aside for industrial sites has been used for this purpose. In fact, at Pueblo West, Colorado, a new project of the Lake Havasu

City developers, twenty percent of the lots (6,000 square feet in size) are designated for mobile home use due to the demand for this type of lot. The reduction of the number of hotel/motel lots has been the result of poor sales experience.

The promotion and selling of lands at Lake Havasu City have been conducted on a nationwide basis. McCulloch Properties has a policy of selling lots only to persons who have actually visited Lake Havasu City and seen the lots they are buying. McCulloch Properties own and operate two prop-jet Electra IIs and four Constellations which fly prospective customers to Lake Havasu City free of charge. Each customer usually makes a deposit equal to his down payment on the lot, which is refunded if the lot is not bought after being viewed.

The Southern California area represents the largest single market for lots, accounting for an estimated 20 to 25 percent of total sales. A main portion of the promotional effort for Lake Havasu City has been concentrated in mid-western cities which in total have accounted for an estimated 40 to 50 percent of lot sales. A promotional effort of similar magnitude has not yet been developed in the main eastern cities. A significant sales response has been experienced in the northwestern states.

Although no exact figures are available, the Holly Development Company, which handles sales for Lake Havasu City, indicates that the greatest single motivation among buyers is for future retirement use. Recreation is also a strong factor, particularly among buyers from California, Arizona and Nevada. An important motivation among all buyers has been the investment appeal of property at Lake Havasu City, as evidenced by the fact that only eight percent of all lots have been built on. Also, it should be noted that with a permanent population of over 4,300 persons, a significant number of buyers have purchased lots for construction of a primary residence.

Streets at Lake Havasu City are wide, paved and designed in a curvilinear pattern to provide attractive vistas, with rights-of-way up to 84 feet. The Irrigation and Drainage District has developed seven wells, capable of supplying a population of 55,000 persons.

Electricity and telephone service are provided by Citizens Utilities Company.

Electric power and water lines are brought to the property at no cost to the purchaser. Natural gas is supplied some tracts by Southern Union Gas Company.

Population projections and increased pressures--the relatively high population density of Los Angeles and its environs, and related urban and environmental problems have placed considerable pressure in recent years on the California desert areas as a source of outdoor recreation experiences. These same problems have caused many older people to seek retirement living space outside of the Los Angeles area. The area treated in this statement is on the fringe of the desert recreation activity and may now only be in the process of "discovery" as a retirement area.

Trends in retirement patterns seem to be more stable than the fads which often direct recreational activity. Persons are retiring earlier, with higher incomes, and with more independence from family and social ties than in previous eras. Establishment of retirement communities throughout southwestern areas offering warm climate for outdoor leisure experiences, pleasant and relaxed environmental surroundings, and adequate commercial, social and health services have proved to be successful and desired by persons from all over the United States. For the impact area, such use is a potential, not an immediate use pressure; other areas along the lower river have more of this type of use and are not yet saturated. On the other hand, other areas also have greater recreation visitor use and the correlation may be more than coincidence since many visitors to the impact area expressed a desire for more commercial facilities, which in turn require a larger resident population.

Economic Conditions

The economy of the area revolves around the recreational use of the Colorado River and Lake Havasu.

The 1970 population of Yuma County was 60,827 and is expected to increase to 88,000 by 1980. The 1975 population was estimated to be 71,000. The population of Mohave County was 25,857 in 1970 and is expected to reach 44,400 by 1980. The 1975 population was estimated at 36,600. This would be a 94 percent increase for Mohave County and a 45.9 percent increase for Yuma County between 1970 and 1980. The major part of this growth is expected to occur in the Parker and Lake Havasu City areas, and substantial land acreage will be needed for community growth and development.

The population of Lake Havasu City in mid-1975 was estimated to be between 9,600 and 10,000, the population of Lake Havasu City is projected to ultimately reach 60,000. The permanent population of Parker is approximately 2,000, but the large number of visitors to this area has created an impact on all the adjacent areas.

Visits to the Planet Ranch area on scenic trips and as overflow crowds from the river may create a demand for vacation-retirement homesites, which is not currently provided by the Parker-Lake Havasu area.

The 1973 per capita personal income for Mohave County was \$4,000. Yuma County per capita personal income for 1973 was \$4,813.

The most important economic sectors in Mohave County by earnings produced, in order of importance are construction, services, wholesale and retail trade, manufacturing, and government (Federal, State, and local). In Yuma County the order of importance is government, farm earnings, wholesale and retail trade, services, construction, and manufacturing. Contract construction is the most important producer of earnings in Mohave County because of the high level of construction in the Lake Havasu City-Bullhead City areas. The contract construction sector in Mohave County increased in earnings from \$5,601,000 in 1968 to \$14,006,000 in 1969.

The wholesale and retail sector and the services sector are exceptionally high producers of earnings in Mohave County, apparently a reflection of the high level of outdoor recreation use in the area. In contrast, Yuma County shows a relatively low percentage of earnings from the services sector.

The major employment sectors in order of importance for Mohave County are: government, trade (wholesale and retail), services, contract construction, and manufacturing. In Yuma County the major sectors are agriculture, government, trade, services, manufacturing, and contract construction. Agriculture in Mohave County (80 to 90 percent range livestock) is a relatively unimportant employer. In contrast, Yuma County, where crop production and feeder livestock are dominant, the agricultural sector is the most important employer. Along the Colorado River recreation use makes the service and trade sectors important.

Environmental Health and Safety Hazards

Hazards on and around the proposed townsite are of two types-- natural and man-caused. The man-caused hazards are few, being limited to moving vehicles, mine shafts in the Planet Mine area, and fences and other improvements around Planet Ranch. Natural hazards are more numerous, including fire, earthquake, poisonous plants, poisonous snakes, rabid animals, infectious diseases, lightning, floods, heat exhaustion, and sunstroke. Only a few of these hazards are a serious threat. The most serious natural hazards are extreme heat and summer cloudbursts which can result in sudden and dangerous floods along downstream washes. There are no known active faults nor has the area been the center of historical seismic activity.

III. The Environmental Impact of the Proposed Action

Introduction

The following unmitigated impacts may be expected if the proposed exchanges are consummated and a town is established in accordance with present plans of the Arizona Ranch and Metals Co.

Climate

The proposal for reclassification and subsequent urbanization of the area will have no significant impact upon the climate of the surrounding area. A possible change in the relative humidity may result from increased irrigation. The degree of change will depend upon the amount of water subject to evaporation and transpiration through the planting and watering of lawns, golf courses, and exposure of water surfaces. The effects of this change will only be felt in the immediate vicinity of the watered areas because of the vastly greater volume of the surrounding drier air mass.

Vegetation

Many native plants on the site will be displaced by the development and construction of homesites, roads and facilities. The equestrian emphasis for the community will result in increased use of all annuals and perennials. Off-site use of plants by horses will occur yearlong in connection with riding trips into the desert. There will also be heavy use of vegetation in all pastures and at corral facilities. Use of vegetation on private property within the area will be dependent upon the personal discretion of each independent property owner. On individual lots desert plant species may be removed or destroyed. Plant species in desert washes or other areas considered as construction-free zones will be protected only as developers, local people, or State laws may require and enforce. Land owners may be expected to want more desert plants for landscaping. Although prohibited by the Arizona Native Plant laws, plants for landscaping may be illegally removed from adjoining Federal, State, or private lands.

Subsurface water of the Bill Williams River was insufficient during the summer of 1972 to provide for survival of all riparian vegetation downstream from the Narrows. Current irrigation use of subsurface flows of the Bill Williams River below Alamo Dam does not exceed 12,000 acre-feet annually. An anticipated 12,500 acre-feet of water will be required to maintain the community and 2,000 acres of pasture land. At least during drought years like 1972, utilization of the water table may be excessive and may prevent maintenance and growth of riparian vegetation below the Narrows. Prominent stands of cottonwood and willows may perish.

Soils

The development of a town will have an adverse effect on soils. Construction and other vehicle use will compact some soils and thus decrease the infiltration rate and increase runoff and sediment yield. On other areas vehicle use will loosen soils and increase erosion. Some recreation use will disturb the soils and remove protective desert pavement and vegetation. Although the soils do not appear to have any severe restrictions that would prevent use of septic tank systems, detailed studies have not been made. Septic tank design and installation will have to meet the approval of county health department standards and the Arizona State Department of Health (appendix K).

Topography

The overall effect of the proposed townsite on the topography of the area should be negligible. Plans call for utilizing existing landscapes as much as possible in the design of homes and facilities to maintain a rustic motif; consequently, cut and fill work needed for construction will be held to a minimum on any given site, and the planned low density, 5-acre lots will limit the total area disturbed.

Little control by any government entity, however, can be exercised over flattening of ridges and changes in alignment of washes. The land could be completely cleared as was done at Lake Havasu City.

Geology

The proposed development will have no impact on the geology of the area.

Water

As presently planned, development of the proposed town will have adverse impacts on both the quantity and quality of water in the area.

The planned uses of water will have a significant impact upon water quality through chemical and biological contamination and further total dissolved solids. Depending on the type of treatment, urban waste water may still contain a certain amount of pollutants. Water thus polluted will enter the water supply through the ground-water directly into the stream or through reuse for irrigation, which would further increase total dissolved solid concentrations.

The quality of water used for irrigation of lawns, shrubs, and pastures will decrease due to TDS concentration. Depending upon the method used, most of the salts in the irrigation water are concentrated in the 10 to 25 percent returned to the groundwater table as recharge. If irrigation and rain waters are allowed to concentrate into runoff through changed drainage patterns, the quality of this water will be decreased as a result of increased suspension of sediment particles in the water. The degree of impact of an increase in TDS on downstream water users is not known.

The temperature of recharge may slightly increase from the urban use of water (appendix J).

Air

The proposed development will have an adverse influence upon air quality.

Particulates in the air will increase as a result of the construction of roads, the central core service area, and flood control structures. Later, as the area becomes more urbanized, the major causes of dust will be off-road and equestrian recreation use, solid waste disposal and transportation over secondary roads.

Construction equipment and automobiles will be the primary sources of air pollution in the area. As the area continues to develop, emissions will increase the amounts of particulates, sulfur dioxide, nitrogen, carbon monoxide, and photochemical oxidants in the air.

Depending upon construction techniques and secondary road surfacing standards, particulates in the air surrounding the urban area may increase from the present background level of 26 to 35 micrograms per cubic meter to above the allowable standard.

Aesthetics

The proposed town will change the visual quality of the developed area, transforming it from a natural desert landscape to one upon which roads and buildings will intrude.

Noise

If the development proceeds as envisioned by Arizona Ranch and Metals Co., noise levels would increase during and after construction. Noise levels could exceed 90 decibels during construction, disturbing both workmen and wildlife on the benchlands.

After construction the community would create noise from traffic and normal urban living. Traffic would probably produce the greatest noise. Most traffic noise would be concentrated near the center of the development. Noises toward the exterior of the community would not be concentrated. Motorcycles and other off-road vehicles could create considerable noise.

The traffic in the Bill Williams River Canyon would disturb the opportunity for solitude that now exists and could also disturb resident wildlife.

Land Use

To support a population of 1,000 to 2,000 people minimal services required include fire and police protection, solid waste disposal facilities, sanitary disposal facilities, water facilities, road maintenance, electric facilities, and medical facilities.

At present, Arizona Ranch and Metals Co. plans no industrial development for the community which the company expects to be a retirement and recreation community.

Utilities furnished would include electricity, telephone, water, and garbage collection. There would have to be individual waste disposal systems for each home. Initial installation of these facilities would adversely affect the immediate construction area by the accompanying dust and noise during construction.

Livestock Grazing

The elimination of cattle grazing on the townsite area would have a beneficial environmental impact. Grazing occurs mostly in the washes which may continue to be used. The land offered for exchange is along the Bill Williams River and is better grazing land than the proposed townsite land.

Wildlife

Wildlife habitat destruction would result from implementation of the proposed project. A loss of habitat would occur directly through conversion of surface resources. Habitat loss would result from the construction of roads, housing developments, service facilities, a golf course, and other recreation facilities. Increased human activity would adversely affect movement and life habits of most wildlife species within the area. The expanded human activities will cause adverse impacts on wildlife species beyond the boundaries of the development.

Rugged terrain, particularly in those areas inhabited by desert bighorn sheep, would receive less human disturbance than those areas more readily accessible to vehicles. Encroachment into desert bighorn sheep areas by the occasional energetic recreationist, hiker, or horseman would add to psychological stresses on bighorn sheep populations.

Factors affecting the declining bighorn sheep populations in Arizona include dam building and water projects, land developments, highway and road construction, recreationists and recreation developments, poaching, and competition with livestock and burros. Bighorn sheep have been reduced in number or no longer occur in various mountain ranges within the State where encroachment on habitat and human activities have been excessive.

Development of the Planet Townsite will be a threat to bighorn sheep populations in the adjoining region. Mountain ranges where the impact may be expected include the Bill Williams Mountains, the Buckskins, the Rawhides, the Mohaves, Aubrey Peak, Castaneda Peak, and Aubrey Hills.

The nearness of bighorn sheep lambing ground to the townsite may further result in harassment of desert bighorn sheep during the critical lambing period which could result in the eventual elimination of the sheep presently using the area.

Development of the Planet Townsite would result in a further reduction in habitat available for the limited population of Mexican antelope that frequent the area. All habitat currently used by the Mexican antelope must be considered crucial to its survival. The proposed action would interrupt the natural movements and migrations of this species, and disturbances or harassment resulting from increased human activities would probably eliminate the local population.

Small game species, primarily quail and doves, probably would not be materially affected by the proposed development. Loss of wildlife would occur in those areas of high density development and occupancy, and the wildlife presently living there would be removed. Additional people would result in increased hunting pressures.

The proposed increase in irrigated pasture may benefit waterfowl by providing them with additional feeding areas.

Paved highway construction from near Havasu Wildlife Refuge through the townsite would be expected to result in increased highway deaths of wildlife. The highway from Havasu Lake to the townsite will cross natural travel routes used by desert bighorn sheep and desert mule deer enroute to water. Increased traffic on a paved highway must be considered as a hinderance to those natural movements and present an increased hazard to all wildlife. The nearness of the townsite highway to the riparian habitat of the Bill Williams River could disturb all species of wildlife associated with the river bottom. The attraction of beaver ponds may be expected to encourage increased visitation by the public.

The development plan calls for the main entrance to the development to be in the southwest corner of the project. The road would be approximately $\frac{1}{4}$ mile from the beaver dams at the Narrows area. This road could have an adverse impact on the beaver living there because of increased harassment. There will be dust and noise during the construction phase and vehicle noise after completion. Paved roads would also increase the rate of runoff from thunderstorms. Although the present plans are to pave the existing road up the Bill Williams River without changing its location, upgrading may require large cuts and fills that will encroach upon riparian habitat.

Development of a remote and undisturbed natural area would create direct conflict with wildlife. Small rodents burrow in developed lawns, gardens, and golf courses. Bighorn sheep, deer, and feral burros might, on occasion, utilize ornamental shrubbery, flowers, and lawns. Coyotes and foxes would occasionally visit the area and other conflicts might occur with skunks, rabbits, and other species. Diseases such as rabies and bubonic plague may cause problems due to the increased number of humans in the area.

The proposed land exchange would result in additional lands becoming available upstream from the Planet Ranch for continued maintenance, protection, and management of riparian habitat by BLM to benefit wildlife.

Watershed

Roads, paved areas, buildings, and other man-made features in the proposed development would affect the watershed in the area by increasing water runoff and erosion. The plan does not contemplate development in the present drainages, but development on the ridges and upland areas will concentrate the runoff and increase the erosion potential.

The major impact on the surrounding area will be from recreation and off-road vehicle use which will radiate out from the townsite with the heaviest concentration on immediately adjacent lands. Damage to vegetation and desert pavement will decrease ground cover and increase erosion potential but the development should not significantly increase sedimentation in the river.

Recreation

The community will create new demands and provide new opportunities for outdoor recreation.

Impacts on recreation resources which could result from increased people pressures are:

1. Bill Williams Mountains

Part of this area may no longer qualify as a primitive area, largely due to the proximity of the town to the east, and the sights and sounds created by the population. Also, there would be increased use of the area for hiking, horseback riding, and nature study.

2. Lands immediately adjacent to the townsite would be used by motorcycles and minibikes. Using the Lake Havasu City development as a model, one can project a band of such use around the area: intensive use out to 1 mile, and use rapidly decreasing in intensity beyond. Four-wheel drive vehicles, dune buggies, and motorcycles would use the roads, trails and washes radiating from the city. Areas of concentration probably would be the Planet Mine area which is laced with roads, the powerline access road west and east of the townsite, the sandy bottom of the Bill Williams River east of the ranch lands, Castaneda Wash, and other dry washes in the area.

3. The historic Planet ruins would probably receive a significant increase in use. Unchecked, this use could result in eventual destruction of the historic remains.

4. With the new population pressures, hobby mining and rockhounding for mineralized specimens might become a significant use.

5. The Swansea historic complex would receive added visitor use, but lack of convenient access should restrict numbers and the associated impacts. Nevertheless, some of the historic features at this site would be altered with only minor increases in visitation.

6. The Bill Williams riparian area would receive increased use for nature study and sightseeing.

Minerals

The establishment of the proposed townsite should have no immediate effect on the use of any mineral resource. No resource minerals other than sand and gravel are known to exist on the actual townsite, and these are sufficient on adjacent lands to supply any conceivable demand.

On only two of the seven parcels of BLM land within the proposed townsite (240 acres), Federally owned mineral rights are involved. Most of the mineral rights on the public lands involved have previously passed out of Federal ownership and are presently owned by either the State of Arizona or the Santa Fe Railroad Company.

Archeology

The proposed action would have both direct and indirect impacts on the archeological resources of the townsite. Those cultural resources already identified will be destroyed or damaged by construction, recreation use, and trails. Cultural resources on State or private lands within the townsite will also suffer damage. Ruins next to the Old Planet Townsite and Swansea will also suffer through increased access. "Pot hunting" is a prevalent southwestern pastime. It is expected that the increased access into the area will lead to an increase in pot hunting and vandalism.

Land Use

Development of the Planet Townsite will place a new area in direct competition for sales of homesites with other nearby developments such as Moovalya Estates, Lake Havasu City, the Colorado Indian Tribes, Bullhead City, and Mohave Indian Reservation developers. Although nothing indicates that additional subdivisions are required for immediate occupancy in this part of Arizona, the development of a new community could affect the growth rate in these areas.

Since Mohave County has jurisdiction over most of this area, the impact of the proposal would increase the county's workload in many areas. Yuma County would be involved with the county road that provides access to the area.

Mohave County would have to create a suitable governmental entity and a reasonable tax base. It would also have to provide police protection by the county sheriff's department, maintenance of a sanitary landfill, fire protection, zoning and planning, school busing, road development and maintenance, compliance checks on building permits, and health facilities.

The development of a new community may cost the county more money than the community contributes because of the cost of providing services.

The proposed project would increase the load for the county planners since they must plan for the desired amenities in the new area. Planning, zoning, and all other aspects of county government would have to be supervised under the Mohave County subdivision requirements, and each item would correspondingly increase the workload of the county. Each sale of property in the project would require the county recorder, assessor, and treasurer to process the transaction. Since the planned development is "retirement oriented" the new residents might further change the political structure of Mohave County.

Economic Impacts

The mining industry and agriculture would change very little since no mining occurs in this area and the lands in agriculture would remain in agriculture.

The increase in population would have an impact on the area.

This new project would increase construction in the area, creating additional job opportunities.

Environmental, Health, and Safety Hazards

Development of the proposed community would introduce to the area hazards common to communities. With more people in the area the number of victims of natural hazards (snakebite, heat exhaustion, and flash floods) will increase.

Wildlife continuing to live in the area will be affected by increased traffic across trails to water, diseases contracted from domestic livestock and poultry, and losses of some of the smaller varieties to dogs and cats. Domestic cats and dogs in turn will be subject to rabies and plague from wild animals and insects.

The number of man-caused range fires may increase. Concentrations of dust and smog will increase in the area as a result of increased population. The concentration of people will increase the hazard from flash floods. More people will also be involved in old mine accidents.

Wildlife and livestock on the highways will create traffic hazards.

Unknown or Partially Understood Impacts

There are unknown factors relating to almost every phase of assessing the potential impact of a development of this type. Where simple cause and effect relationships exist, the results of a given action can be predicted accurately. Where a number of variables are involved, however, predictions are the sum of the choices and assumptions made on the subject. These predictions may or may not give a true picture of what will eventually happen. Potential impacts vary widely according to the basic assumptions made. All potential impacts are important for preserving either the environment or natural resources.

For example, the proposed developments will adversely affect bighorn sheep, the Yuma clapper rail, and Mexican antelope. How much adverse impact, however, cannot be accurately predicted.

Although some archeological sites have been identified, the total number and importance of sites on and around the project area are currently unknown. Therefore, the potential impact of development in this area is also unknown.

The long-range effects of existing and proposed structures and septic tanks on the quantity and quality of water are imperfectly understood because of a lack of specific data. Vegetation along some downstream areas of the Bill Williams River is currently dying. Possible causes include a 2-year drought, the recent (1968) construction of Alamo Dam 25 miles upstream, and local beaver dams. The interrelationships are already complex, and community development in the area would make them even more complex. The impact that increasing total dissolved solids in water will have on downstream water users is not fully understood, although such impacts are recognized to be adverse. With additional data these impacts can be quantified.

Various ecological interrelationships may be adversely affected at some stage of this development in ways, or to degrees, that cannot yet be measured.

IV. Mitigating Measures Included in the Proposed Action

If the proposed exchange is consummated, the patents (deeds) issued by BLM would not contain any covenants governing the use to which the lands would be put or the terms or conditions of such use. Nothing in the patents would require the company to develop the lands according to its plans and nothing would prevent the company from selling all or part of the lands to others.

Vegetation and Soils

Plants displaced through construction of roads, residences, or other facilities may serve to partially satisfy the demand for plants needed for landscaping.

The developer indicates that deed restrictions will be imposed to lessen overall disturbances of the soil and plants. The general plan of development, as well as deed and architectural design limitations, make the following specifications for the Planet development: (1) low density 5-acre lots, (2) minimum landscaping to provide a rustic western setting, (3) minimum construction within drainage channels, and (4) designation of suitable areas for off-road vehicle use within the townsite area.

Topography

Plans call for using existing landscapes as much as possible in the design of homes and facilities to maintain a rustic motif. Consequently, cut and fill work needed for construction will be minimized on any given site, and the planned low-density (development) will limit the total area disturbed.

Water

Federal, State, and county sewage treatment and septic tank regulations apply to the plan of development (appendix K), and water quality degradation will be controlled by these requirements. A low-density rustic desert landscape theme will reduce the need for irrigation water. Detention structures approved under plans authorized by the State of Arizona will reduce the potential for flood or soil displacement by runoff.

Air

Contamination resulting from construction will be of short duration. Paving of primary and secondary roads will reduce particulate matter. All residents will utilize electricity rather than natural gas. Natural air movements in the area reduce the likelihood of stagnant air or inversion. The development is not anticipated to have problems meeting present ambient air quality standards for Arizona.

Aesthetics

Deed restrictions imposed by the developer will not permit single family dwellings to exceed one level which will thereby reduce the visual impact. An overhead powerline will approach the area from the south, but only about 1 mile of overhead line will be added to that already existing.

The sanitary landfill will be operated according to Federal and State standards.

The visual impact of the development may be reduced by the plan for low-density development, emphasis of rustic desert setting, maintenance of natural theme, and the continuance of irrigated pasture lands within the Bill Williams floodplain. Underground electric distribution lines will also reduce aesthetic conflict.

The plan of development for a residential rather than industrial community will limit the potential noise impact on the region.

Land Use

The developer has proposed deed restrictions to assure that a high standard of development is maintained. The restrictions provide for architectural control, uniform fencing, prohibition of obtrusions on the lot, residences of a minimum of 1,200 square feet dwelling space, prohibition of subdivision of lots, easements for public services, and compliance with the uniform building code, national electric code, and uniform plumbing code. Additional restrictions could prevent the establishment of mobile home facilities except during a 6-month interim period during construction. Direct vehicle access from lots to the highway will be prohibited.

Covenants and conditions of the declaration run with the land and shall be binding upon all parties for 25 years and extended thereafter in 10-year increments. These conditions can only be changed where a majority of the owners agree to modification of the covenants.

All utilities will be underground within the community. Low-density development is planned. This will reduce visual and noise impacts.

The developer has identified planning and zoning requirements and has provided for areas required for water drainage channels and water flow retardation basins. A portion of the development has been designated as an agricultural-residential district and the remainder as an open space district. Mohave County subdivision regulations and planning ordinances apply. All relevant State and Federal laws must also be met.* Where applicable, enforcement of

*State Air Pollution Control--chapter 14
Public Health Control--chapter 6
Arizona State Dept. of Health--amendments to rules and regulations
for air pollution control
Subdivision Regulations, Mohave County, 1970
Planning Ordinances, Mohave County, 1968

county, State, and Federal laws may be expected by the appropriate government agency. Deed restrictions and covenants may be expected to be enforced by the developer or as necessary by individual residents through civil action.

Sanitation laws on waste disposal and sewage treatment controls are adequate to minimize the impact of development. Present air and water quality controls provide regulation by the State and county over these aspects.

Wildlife

With development and intensive management, the private lands to be acquired by the Federal Government in the proposed exchange could provide for mitigation of some wildlife values lost through site development. The private lands offered for exchange include bighorn sheep habitat, Yuma clapper rail habitat, Mexican antelope habitat, and lands of primitive character with historic, scenic, recreation, and open space values.

The riparian habitat along the Bill Williams River is important to wildlife, and if acquired by the Federal Government, these lands can be managed for the benefit of wildlife.

Recreation

The recreation facilities provided for within the community can reduce recreation impact on the adjacent lands.

Improved access will increase the area available for recreation.

Minerals

No mitigating measures proposed.

Archeology

Before the completion of the exchanges, mitigative measures similar to those suggested in appendix H will be instituted. Since a land exchange does not allow stipulations to be attached to the deed, the recommendation to make a park around the two sleeping circles cannot be implemented and these will be mitigated as other sites have been.

A 106/2b Statement of Effect will be prepared on the Swansea complex before the completion of the exchange and submitted to the State Historic Preservation Officer and to the Advisory Council on Historic Preservation for comment. The 106/2b statement will contain a program of mitigation for the site, aimed at protecting it from vandalism.

V. Adverse Effects Which Cannot be Avoided Should the Proposal be Implemented

This environmental statement has identified various impacts that will remain and that can affect the natural environment even if all mitigation measures of the proposal are effected. Mitigating measures include those features specifically identified in the proposal or those features imposed by virtue of Federal, State, or county laws and regulations.

Vegetation

Less than 5 percent of the native desert vegetation on the site will be replaced by structures or exotic vegetation. All annuals and perennials in equestrian areas will be subject to heavy use. Riparian vegetation downstream from the water supply during dry years may not be sustained. Some desert vegetation will be removed for landscaping of private residences.

Soil

Soil productivity will be lost where concrete and asphalt are placed on the surface. Accelerated wind and water erosion may be expected where soil is denuded of vegetation. Natural drainage channels will be particularly susceptible to soil loss after protective vegetation is removed. Off-road vehicle use and other forms of intensive recreation will result in compacted soil.

Less than 5 percent of the townsite will undergo soil disturbance during construction and development. The disturbed soil will become impervious to water because of surfacing and compaction. Increased runoff will occur. Off-road vehicle use within the urban area may increase the potential for disturbance of surface resources on adjoining Federal lands.

Water

The 500 acre-ft of water used by the community will not be available for future agricultural use. During drought years, demand for underground water may exceed the recharge and, consequently, downstream surface flows of the Bill Williams River could terminate or be seriously reduced. Agricultural and community use of the underground water will result in degradation of water quality. Water quality within the Bill Williams River will further deteriorate as the result of increased total dissolved solids in the waste water and irrigation water. An increase in water temperature may also be expected.

Air

The State standards for particulate matter may be exceeded during periods of construction. Particulates of sulphur dioxide, nitrogen, carbon monoxide and photochemical oxidants will increase commensurate with community growth.

Aesthetics

The aesthetics of a remote undisturbed desert region will be altered to provide for the residential community. Visual scarring of the landscape from the development will detract from the natural scene. Increased littering will occur. Atmospheric haze will increase from vehicle use of unpaved roads and other activities of man.

The natural desert open space landscape will be modified. Increased recreation use throughout the region will affect the aesthetics of the area to the degree not constrained by State or Federal laws or other management measures by the administering land agencies.

Noise

Increase of existing noise levels associated with the community and its development cannot be prevented.

Wildlife

Urbanization of the townsite will eliminate upland desert wildlife habitat and affect adjacent public lands through human disturbance associated with the community. Recreation uses will extend over wildlife habitat throughout the region to the degree that access may allow. Natural movements of Mexican antelope and desert bighorn sheep within the region will be disrupted. Increased road traffic will result in increased highway deaths of wildlife and provide additional human impact on wildlife resources along the Bill Williams River and Havasu National Wildlife Refuge. Life patterns of small game species and migratory birds on and adjacent to the cultivated lands of the Planet Ranch will be disturbed by increased human activity.

Disturbances to wildlife on the townsite and adjacent public lands will increase in proportion to the growth of the community. Due to increased human activity and noise levels, increased human activity in remote areas inhabited by bighorn sheep and Mexican antelope will be a threat to these species. If the endangered Yuma clapper rail is still using the townsite area, the development will displace the rail.

Recreation

A natural desert landscape will be transposed into a low-density urban community. Adjacent lands will receive increased recreation pressure from the inhabitants. Some undisturbed environments will receive increased use from horseback riders, hikers, and general recreationists. The visual impact of the community within the previously unspoiled desert landscape cannot be avoided. The feeling of solitude one can enjoy in an undisturbed desert region will be lost.

Archeology

Although archeological studies are planned that would minimize some of the negative effects of the proposed action, there is always unavoidable destruction of archeological resources. According to the Prescott College archeological report, however, those resources that will be destroyed are not the only examples and, therefore, not so rare that their destruction would create a void in the archeological record.

VI. The Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance of Long-Term Productivity

Short-term uses of this area are considered to be those associated with the natural or present uses of the area, such as wildlife, livestock, and recreation. Long-term uses of this area are considered to be those associated with the proposed townsite, since conversion of the land to urban use would be a long-term commitment.

The construction of a planned community will, in time, change or eliminate some of the present uses. Wildlife such as beaver, Yuma clapper rail, Mexican antelope, and desert bighorn sheep may be adversely affected. Other species of wildlife such as quail and various songbirds may adapt or find conditions more to their liking in an urban environment.

Nonrenewable resources such as archeological remains may be changed or destroyed by the intrusion of man.

The soil productivity will decrease in some areas because of increased erosion, compaction, and paving. But with watering of plants and shrubs, the overall production of vegetation may increase.

If the proposed town would provide long-term enhancement of a pleasant life style and atmosphere for its occupants, the human environment would be enhanced.

VII. Irreversible and Irretrievable Commitment of Resources

Vegetation

Removal of vegetation will occur with development of the community. This action will be irretrievable only insofar as the surface is converted to use or development which prevents revegetation. The low plant density of the site should prevent extensive loss of plants through development or use.

Aesthetics

The natural landscape will be altered with structural and surface features common to a community. Atmospheric and water quality will be degraded as a consequence of human activities within the region.

Residential development will detract from the relatively undeveloped natural aspect of the area.

Land Use

Allowance of the exchanges would, in effect, subject adjacent lands to pressure for future development.

Wildlife

Any development of the area that can threaten the survival of an endangered species of wildlife must be considered irreversible. A reduction in the water table and the resulting loss of riparian vegetation of marshland within the Bill Williams arm of the Havasu National Wildlife Refuge could further restrict habitat essential for the survival of the Yuma clapper rail, which is an endangered species.

Development of the Planet Townsite will encroach directly on habitat used by a remnant population of Mexican antelope. The combination of human harassment and loss of habitat will affect the survival of Mexican antelope. Lambing grounds adjacent to the site are crucial to the survival of bighorn sheep within the region. Damage caused by human encroachment into these areas for recreation or other activities can be considered irreversible where the wilderness character of bighorn sheep range is lost and where bighorn are displaced or decline significantly in number. Human activities south of the Bill Williams River have caused irreversible destruction of important habitat for bighorn sheep.

Recreation

The primitive or wilderness aspects of the area will be lost.

Archeology

Since archeological remains comprise a limited and nonrenewable resource base, any action that reduces this base represents an irreversible commitment of resources. Mitigation studies and "set-asides" for public exhibit will not lessen these commitments since some sites will be lost through development.

VIII. Alternatives

No Action

If no action is taken to exchange lands, then present private and public land could not be consolidated into a contiguous area for a townsite development. Development could proceed, however, on all or part of the private lands within the area. Arizona Ranch and Metals Co. has indicated that residential development of the private lands suitable for development will occur even though the exchange is not consummated (see letter, appendix F, from Ryley, Carlock & Ralston, Attorneys for Arizona Ranch and Metals Co.). The proposed 500-homesite development could be modified slightly and developed to over 400 homesites on land presently owned by Arizona Ranch and Metals Co. The proposed development could also be modified considerably to a much heavier development density.

If no action is taken, there would still be adverse environmental impacts. Development on fragmented private lands could have as much or more impact than the proposed action. Adjoining public lands interlinked with State and private lands would be traversed by all uses associated with development. Interlinked public land would lose its present primitive character. Management of interlinked lands for public interest would become more difficult.

Offered private lands may not be available for wildlife or other public interests. There would be a reduced tax base for the county and State and less economic gain to local communities for services, goods, and products. There might also be less improvement opportunity at nearby communities and less demand for financing and governmental services.

Modify Exchanges

Unlimited possibilities exist for modifying the proposed exchange. After the issuance of the Draft Environmental Impact Statement, Arizona Ranch and Metals Co. modified their exchange (chapter 1).

The proposed exchanges could be modified to exclude some lands and add others. No specific changes have been considered, but if private land on the Bill Williams River adjacent to the bighorn sheep lambing grounds were transferred to the government, there could be less human impact on the bighorn, a more permanent watering place for bighorn sheep and deer, and an undisturbed area for wildlife to cross the river.

The consequences on adjoining lands will continue as previously described if a townsite to accommodate 500 families is developed within the described area. Modification of the exchange proposal could not be expected to detract significantly from the impacts of the proposed community.

A reduction in acreage allowed for transfer from Federal ownership could reduce environmental consequences associated with the plan of development only where development density is also relatively reduced. Increased residential density could offset any benefits expected to result from reduction in acreage transferred from Federal ownership.

Planned development on private lands can proceed by design of the owner as consistent with county, State, and Federal laws and regulations. Modification of the transfer could not assure that improved public benefit would result.

Public Acquisition of Private and State Lands

Private lands in Planet Ranch could be acquired by the Federal Government through exchange, purchase, or a combination of the two. Such action could eliminate the townsite development and tend to maintain the present undeveloped nature of this particular area.

Other Federal lands could be offered in exchange for private and State lands within the project area. Lands offered would need to be acceptable to the State and private land holders. The offered lands would need to have the potential for a similar development if the exchange method were adopted.

A substitution of this nature should only be made within the framework of an approved statewide land use plan. These plans have not been developed by the State of Arizona. Political, social, economic, and environmental considerations are required to project the need and suitable locations for future cities.

It is questionable whether other sites with potential for development could be identified on national resource lands where a similar environmental impact would not result from a townsite development. BLM does not have the authority to purchase State or private lands. If the private and State lands have outstanding public values that could be protected only by Federal ownership, then Congressional action could be taken to allow public acquisition by purchase.

Direct Sale of Land

With enabling legislation, direct sale of the Federal land to the Arizona Ranch and Metals Co. would be possible. The offered private lands would not be available to mitigate lost wildlife habitat and for other public purposes. There would, however, be an increased tax base for the counties and the State. Other environmental impacts would be the same as the proposed exchange.

IX. Consultation and Coordination with Others

In accordance with the CEQ Guidelines, copies of the Draft Statement (DES 73-18) were sent to approximately 250 different organizations, governmental agencies, and private citizens who had indicated an interest in this proposal.

Of those contacted, we received a total of 51 written replies. Copies of each response are included in this final statement as appendix F.

The majority of the comments can be divided into four general categories:

1. Those favoring the proposed exchange and townsite development.
2. Those opposing the townsite development and/or requesting that the decision be delayed pending further study and planning.
3. Those who raised questions and/or commented on the adequacy of the data.
4. Those who offered additional information concerning possible environmental impacts.

A number of comments contained a combination of the previous categories. The text of this final statement has been revised to include additional data or clarify items that were questioned by those submitting comments.

Comments received from various groups concerning the need, design, or economics will be considered before making a decision on which course of action to take. Within this document, consideration is given to those comments that relate to anticipated environmental impacts.

Specific comments on items or issues mentioned in each letter received on the Draft Environmental Impact Statement are made in connection with each response; both are contained in appendix F of this statement.

Thirty days following the release of this Final Environmental Impact Statement, the Bureau of Land Management may publish a Proposed Classification Decision which will be distributed to all concerned agencies, groups, and individuals. A decision will be made whether to hold a public hearing after we receive comments from the public on the proposed classification.

APPENDICES A through K

Plants

| | |
|------------------------|------------------------|
| Blue Palo-verde | Cercidium floridium |
| Yellow Palo-verde | Cercidium microphyllum |
| Mesquite | Prosopis juliflora |
| Desert ironwood | Olneya tesota |
| Jerusalem-thorn | Parkinsonia aculeata |
| Salt cedar | Tamarix gallica |
| Athel tamarisk | Tamarix aphylla |
| Fremont-cottonwood | Populus fremontii |
| Willow | Salix sp. |
| Creosote bush | Larrea tridentata |
| Crucifixion thorn | Koeberlinia spinosa |
| Smoke tree | Dalea spinosa |
| Brittle-bush | Encelia sp. |
| Bur-sage | Franseria dumosa |
| Mormon tea | Ephedra sp. |
| Range ratany | Krameria grayi |
| Saguaro | Cereus giganteus |
| Staghorn cholla | Opuntia versicolor |
| Barrel cactus | Ferocactus sp. |
| Teddy Bear cholla | Opuntia sp. |
| Ocotillo | Fouquieria splendens |
| Catclaw | Acacia greggii |
| Wild buckwheat | Eriogonum sp. |
| Galleta | Hilaria jamesii |
| Six weeks grama | Bouteloua barbata |
| Six weeks needle grama | Bouteloua aristidoides |
| Six weeks three awn | Aristida adscensionis |
| Three awn | Aristida arizonica |
| Filaree | Erodium cicutarium |
| Indian wheat | Plantago insularis |
| Cattail | Typha domingensis |
| Arrowweed | Pluchea sp. |
| Bullrush | Scirpus sp. |

MAMMALS

| | |
|-----------------------------|--|
| Desert bighorn sheep | <u>Ovis canadensis nelsoni</u> or <u>Ovis canadensis mexicana</u> |
| Desert mule deer | <u>Odocoileus hemionus eremica</u> |
| Cottontail rabbit | <u>Sylvilagus auduboni</u> |
| Blacktailed rabbit | <u>Lepus californicus</u> |
| Beaver | <u>Castor canadensis</u> |
| Muskrat | <u>Ondatra zibethica</u> |
| Porcupine | <u>Erethizon dorsatum</u> |
| Raccoon | <u>Procyon lotor</u> |
| Bobcat | <u>Lynx rufus</u> |
| Coyote | <u>Canis latrans</u> |
| Desert kit fox | <u>Vulpes velox</u> |
| Gray fox | <u>Urocyon cinereoarcentus</u> |
| Striped Skunk | <u>Mephitis mephitis</u> |
| Spotted Skunk | <u>Spilogale putorius</u> |
| Badger | <u>Taxidea taxus</u> |
| Ringtailed cat | <u>Bassariscus astutus</u> |
| Yuma mountain lion | <u>Felis concolor browni</u> |
| Mexican pronghorn | <u>Antilocapra americana mexicana</u> |
| Burro | <u>Equus asinus</u> |
| Spotted bat | <u>Euderma maculata</u> |
| Pallid bat | <u>Antrozous pallidus</u> |
| California leaf-nosed bat | <u>Macrotus californicus</u> |
| Arizona myotis | <u>Myotis occultus</u> |
| Cave myotis | <u>Myotis velifer</u> |
| Yuma myotis | <u>Myotis yumanensis</u> |
| Western pipistrel | <u>Pipistrellus hesperus</u> |
| Mexican freetail bat | <u>Tadarida brasiliensis</u> |
| Yuma antelope squirrel | <u>Ammospermophilus harrisi</u> |
| Whitetail antelope squirrel | <u>Ammospermophilus leucurus</u> |
| Roundtail ground squirrel | <u>Citellus tereticaudus</u> |
| Valley pocket gopher | <u>Thomomys bottae</u> |

MAMMALS

| | |
|----------------------------|----------------------------------|
| Longtail pocket mouse | <u>Perognathus formosus</u> |
| Arizona pocket mouse | <u>Perognathus amplus</u> |
| Desert pocket mouse | <u>Perognathus penicillatus</u> |
| Rock pocket mouse | <u>Perognathus intermedius</u> |
| Spiny pocket mouse | <u>Perognathus spinatus</u> |
| Western harvest mouse | <u>Reithrodontomys megalotis</u> |
| Canyon mouse | <u>Peromyscus crinitus</u> |
| Cactus mouse | <u>Peromyscus eremicus</u> |
| Deer mouse | <u>Peromyscus maniculatus</u> |
| House mouse | <u>Mus musculus</u> |
| Southern grasshopper mouse | <u>Onychomys torridus</u> |
| Merriam kangaroo rat | <u>Dipodomys merriami</u> |
| Desert kangaroo rat | <u>Dipodomys deserti</u> |
| Hispid cotton rat | <u>Sigmodon hispidus</u> |
| Whitethroat woodrat | <u>Neotoma albigula</u> |
| Desert wood rat | <u>Neotoma lepida</u> |
| Crawford shrew | <u>Notiosorex crawfordi</u> |
| Western mastiff bat | <u>Eumops perotis</u> |
| Townsend's big-eared bat | <u>Corynorhinus townsendii</u> |

BIRDS

| | |
|---------------------------|-----------------------|
| Common Loon | Red-tailed Hawk |
| Arctic Loon | Swainson's Hawk |
| Horned Grebe | Zone-tailed Hawk |
| Eared Grebe | Rough-legged Hawk |
| Western Grebe | Ferruginous Hawk |
| Pied-billed Grebe | Harris' Hawk |
| White Pelican | Golden Eagle |
| *Brown Pelican | *Bald Eagle |
| Double-crested Cormorant | Marsh Hawk |
| Great Blue Heron | Osprey |
| Green Heron | Prairie Falcon |
| Common Egret | *Peregrine Falcon |
| Snowy Egret | Pigeon Hawk |
| Black-crowned Night Heron | Sparrow Hawk |
| Least Bittern | Gambel's Quail |
| American Bittern | Sandhill Crane |
| Wood Ibis | * Yuma Clapper Rail |
| White-faced Ibis | Virginia Rail |
| Whistling Swan | Sora |
| Canada Goose | Common Gallinule |
| White-fronted Goose | American Coot |
| Snow Goose | Semipalmated Plover |
| Blue Goose | Snowy Plover |
| Ross' Goose | Killdeer |
| Fulvous Tree Duck | Mountain Plover |
| Mallard | Black-bellied Plover |
| Gadwall | Common Snipe |
| Pintail | Long-billed Curlew |
| Green-winged Teal | Whimbrel |
| Blue-winged Teal | Spotted Sandpiper |
| Cinnamon Teal | Solitary Sandpiper |
| European Widgeon | Willet |
| American Widgeon | Greater Yellowlegs |
| Shoveler | Lesser Yellowlegs |
| Wood Duck | Pectoral Sandpiper |
| Redhead | Baird's Sandpiper |
| Ring-necked Duck | Least Sandpiper |
| Canvasback | Dunlin |
| Lesser Scaup | Long-billed Dowitcher |
| Common Goldeneye | Western Sandpiper |
| Bufflehead | Marbled Godwit |
| Oldsquaw | Sanderling |
| Ruddy Duck | American Avocet |
| Hooded Merganser | Black-necked Stilt |
| Common Merganser | Red Phalarope |
| Red-breasted Merganser | Wilson's Phalarope |
| Turkey Vulture | Parasitic Jaeger |
| Sharp-shinned Hawk | Herring Gull |
| Cooper's Hawk | California Gull |

*Listed in May 1974 edition of "United States List of Endangered Fauna."

BIRDS

| | |
|---------------------------|--------------------------|
| Ring-billed Gull | Violet-Green Swallow |
| Franklin's Gull | Tree Swallow |
| Bonaparte's Gull | Bank Swallow |
| Sabine's Gull | Rough-winged Swallow |
| Forster's Tern | Barn Swallow |
| Common Tern | Cliff Swallow |
| Caspian Tern | Purple Martin |
| Black Tern | Steller's Jay |
| Mourning Dove | Scrub Jay |
| White-winged Dove | Common Raven |
| Ground Dove | Pinyon Jay |
| Yellow-billed Cuckoo | Verdin |
| Roadrunner | Bushtit |
| Barn Owl | White-breasted Nuthatch |
| Screech Owl | Red-breasted Nuthatch |
| Great Horned Owl | Brown Creeper |
| Long-eared Owl | House Wren |
| Short-eared Owl | Bewick's Wren |
| Poor-will | Cactus Wren |
| Lesser Nighthawk | Long-billed Marsh Wren |
| Vaux's Swift | Canyon Wren |
| White-throated Swift | Rock Wren |
| Black-chinned Hummingbird | Mockingbird |
| Costa's Hummingbird | Bendire's Thrasher |
| Rufous Hummingbird | Crisal Thrasher |
| Belted Kingfisher | Sage Thrasher |
| Red-shafted Flicker | Robin |
| Gilded Flicker | Hermit Thrush |
| Gila Woodpecker | Swainson's Thrush |
| Acorn Woodpecker | Western Bluebird |
| Lewis' Woodpecker | Mountain Bluebird |
| Yellow-bellied Sapsucker | Townsend's Solitaire |
| Williamson's Sapsucker | Blue-gray Gnatcatcher |
| Ladder-backed Woodpecker | Black-tailed Snatcatcher |
| Tropical Kingbird | Ruby-crowned Kinglet |
| Western Kingbird | Water Pipit |
| Cassin's Kingbird | Cedar Waxwing |
| Wied's Crested Flycatcher | Phainopepla |
| Ash-throated Flycatcher | Loggerhead Shrike |
| Eastern Phoebe | Starling |
| Black Phoebe | Hutton's Vireo |
| Say's Phoebe | Bell's Vireo |
| Traill's Flycatcher | Gray Vireo |
| Hammond's Flycatcher | Yellow-throated Vireo |
| Gray Flycatcher | Solitary Vireo |
| Western Flycatcher | Warbling Vireo |
| Western Wood Pewee | Black-and-white Warbler |
| Olive-sided Flycatcher | Blue-winged Warbler |
| Vermilion Flycatcher | Orange-crowned Warbler |
| Horned Lark | Nashville Warbler |

BIRDS

| | |
|------------------------------|----------------------------|
| Lucy's Warbler | Lark Sparrow |
| Yellow Warbler | Black-throated Sparrow |
| Virginia Warbler | Sage Sparrow |
| Magnolia Warbler | Slate-colored Junco |
| Myrtle Warbler | Oregon Junco |
| Audubon's Warbler | Gray-headed Junco |
| Black-throated Gray Warbler | Chipping Sparrow |
| Townsend's Warbler | Brewer's Sparrow |
| Black-throated Green Warbler | Black-chinned Sparrow |
| Hermit Warbler | White-crowned Sparrow |
| Northern Waterthrush | Golden-crowned Sparrow |
| MacGillivray's Warbler | Fox Sparrow |
| Yellowthroat | Lincoln's Sparrow |
| Yellow-breasted Chat | Swamp Sparrow |
| Wilson's Warbler | Song Sparrow |
| American Redstart | Chestnut-collared Longspur |
| House Sparrow | |
| Western Meadowlark | |
| Yellow-headed Blackbird | |
| Red-winged Blackbird | |
| Hooded Oriole | |
| Scott's Oriole | |
| Bullock's Oriole | |
| Rusty Blackbird | |
| Brewer's Blackbird | |
| Brown-headed Cowbird | |
| Western Tanager | |
| Summer Tanager | |
| Cardinal | |
| Rose-breasted Grosbeak | |
| Black-headed Grosbeak | |
| Blue Grosbeak | |
| Lazuli Bunting | |
| Varied Bunting | |
| Dickcissel | |
| Purple Finch | |
| House Finch | |
| Pine Siskin | |
| American Goldfinch | |
| Lesser Goldfinch | |
| Lawrence's Goldfinch | |
| Green-tailed Towhee | |
| Rufous-sided Towhee | |
| Abert's Towhee | |
| Lark Bunting | |
| Savannah Sparrow | |
| Grasshopper Sparrow | |
| Vesper Sparrow | |

REPTILES AND AMPHIBIANS

| | |
|----------------------------|------------------------------------|
| Couch's spade-footed toad | <u>Scaphiopus couchi</u> |
| Colorado river toad | <u>Bufo alvarius</u> |
| Bullfrog | <u>Rana catesbeiana</u> |
| Leopard frog | <u>Rana pipiens</u> |
| Desert tortoise | <u>Gopherus agassizi</u> |
| Spiny soft-shelled turtle | <u>Trionyx spiniferus</u> |
| Gila monster | <u>Heloderma suspectum</u> |
| Banded gecko | <u>Coleonyx variegatus</u> |
| Desert iguana | <u>Dipsosaurus dorsalis</u> |
| Leopard lizard | <u>Crotaphytus wislizeni</u> |
| Collared lizard | <u>Crotaphytus collaris</u> |
| Zebra-tailed lizard | <u>Callisaurus draconoides</u> |
| Long-tailed brush lizard | <u>Urosaurus graciosus</u> |
| Tree lizard | <u>Urosaurus ornatus</u> |
| Side-blotched lizard | <u>Uta stansburiana</u> |
| Desert horned lizard | <u>Phrynosoma platyrhinos</u> |
| Chuckwalla | <u>Sauromalus obesus</u> |
| Western blind snake | <u>Leptotyphlops humilis</u> |
| Checkered garter snake | <u>Thamnophis marcianus</u> |
| Whipsnake (Coachwhip) | <u>Masticophis flagellum</u> |
| Desert patch-nosed snake | <u>Salvadora hexalepis</u> |
| Bullsnake | <u>Pituophis melanoleucus sayi</u> |
| Glossy snake | <u>Arizona elegans</u> |
| Long-nosed snake | <u>Rhinocheilus lecontei</u> |
| Common king snake | <u>Lampropeltis getulus</u> |
| Spotted leaf-nosed snake | <u>Phyllorhynchus decurtatus</u> |
| Western shovel-nosed snake | <u>Chionactis occipitalis</u> |
| S.W. Lyre snake | <u>Trimorphodon lyrophanes</u> |
| Night snake | <u>Hypsiglena torquata</u> |
| Arizona coral snake | <u>Micruroides euryxanthus</u> |
| Western diamondback | <u>Crotalus atrox</u> |
| Black-coral rattlesnake | <u>Crotalus molossus</u> |
| Mojave rattlesnake | <u>Crotalus scutulatus</u> |
| Sidewinder | <u>Crotalus cerastes</u> |

APPENDIX B

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[Serial No. A 6930]

ARIZONA

Notice of Proposed Classification of Public Lands for Transfer Out of Federal Ownership

1. Pursuant to the Taylor Grazing Act of June 28, 1934 (48 Stat. 1275, as amended, 43 U.S.C. 315), and the regulations in 43 CFR Part 2462, it is proposed to classify the public lands described below for transfer out of Federal ownership by exchange. The transfers would be accomplished under authority of section 8 of the Taylor Grazing Act.

2. Publication of this notice has the effect of segregating the described lands from all forms of appropriation under the public land laws, including the mining and mineral lease laws, except that these lands will remain open to filing of State exchange applications. If and when these lands are classified for exchange, applications for private exchange may be filed in accordance with the regulations in 43 CFR Part 2202.

3. The public lands proposed for classification in this notice are located in the vicinity of the Planet Ranch on the Bill Williams River in Mohave and Yuma Counties. These public lands have potential for residential development in conjunction with planned developments on private lands at the Planet Ranch. The transfer of these public lands out of Federal ownership by exchange will enable the United States to acquire State and private lands elsewhere along the Bill Williams River Valley and in the surrounding desert mountains, to help block up and preserve Federal land management areas with significant wildlife, recreation, and primitive values.

4. The public lands proposed for classification in this notice are shown on maps on file and available for inspection in the Phoenix District Office, Bureau of Land Management, 3029 West Clarendon Avenue, Phoenix, AZ 85017; the Kingman Office, Kingman, Ariz. 86401; and the State Office, 3022 Federal Building, Phoenix, Ariz. 85025.

5. The lands involved are located in Mohave and Yuma Counties and are described as follows:

GILA AND SALT RIVER MERIDIAN

T. 11 N., R. 16 W.

Sec. 1, lots 3 and 4, S $\frac{1}{2}$ NW $\frac{1}{4}$, and SW $\frac{1}{4}$;Sec. 2, SW $\frac{1}{4}$;Sec. 3, lots 1 to 4, inclusive, S $\frac{1}{2}$ N $\frac{1}{2}$, and S $\frac{1}{2}$;Sec. 5, lots 1 to 4, inclusive, S $\frac{1}{2}$ N $\frac{1}{2}$, and S $\frac{1}{2}$;Sec. 6, lots 1 to 7, inclusive, SE $\frac{1}{4}$ NW $\frac{1}{4}$, S $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;Sec. 7, lots 1 to 4, inclusive, E $\frac{1}{2}$ W $\frac{1}{2}$, and E $\frac{1}{2}$;

Sec. 9;

Sec. 11;

Sec. 12, W $\frac{1}{2}$;Sec. 13, W $\frac{1}{2}$;

Sec. 15;

Sec. 16, N $\frac{1}{2}$, N $\frac{1}{2}$ SW $\frac{1}{4}$, SW $\frac{1}{4}$ SW $\frac{1}{4}$, and SE $\frac{1}{4}$;

Sec. 17;

Sec. 19, lots 1 to 4, inclusive, E $\frac{1}{2}$ W $\frac{1}{2}$, and E $\frac{1}{2}$;

Sec. 23;

Sec. 24, W $\frac{1}{2}$;Sec. 25, NW $\frac{1}{4}$, NW $\frac{1}{4}$ SW $\frac{1}{4}$, and SW $\frac{1}{4}$ NE $\frac{1}{4}$;Sec. 27, N $\frac{1}{2}$ N $\frac{1}{2}$; andSec. 29, NW $\frac{1}{4}$, and W $\frac{1}{2}$ NE $\frac{1}{4}$.

T. 11 N., R. 17 W.

Sec. 34, NE $\frac{1}{4}$ NE $\frac{1}{4}$; andSec. 36, SE $\frac{1}{4}$ NE $\frac{1}{4}$.

T. 10 N., R. 16 W.

Sec. 3, N $\frac{1}{2}$ N $\frac{1}{2}$;Sec. 4, N $\frac{1}{2}$ N $\frac{1}{2}$;Sec. 5, lot 1, N $\frac{1}{2}$ NE $\frac{1}{4}$, and NE $\frac{1}{4}$ NW $\frac{1}{4}$; and

Sec. 6, lot 1.

The lands described aggregate approximately 9,646.37 acres of public land.

6. For a period of 60 days from date of publication of this notice in the Federal Register, all persons who wish to submit comments, suggestions, or objections in connection with the proposed classification may present their views to the State Director, Bureau of Land Management, 3022 Federal Building, Phoenix, Ariz. 85025.

JOE T. FALLINI,
State Director.

APRIL 21, 1972.

[PR Doc. 72-6413 Filed 4-26-72; 8:48 am]

LAW OFFICES

RILEY, CARLOCK & RALSTON

114 WEST ADAMS STREET

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 JAMES D. O'NEIL

AREA CODE 602
 TELEPHONE 268-7701

SUN CITY OFFICE
 PLAZA DEL SOL WEST
 10771 WEST PEORIA AVENUE
 933-5972

July 21, 1972

Arizona State Office
 Bureau of Land Management
 Department of the Interior
 3022 Federal Building
 Phoenix, Arizona 85025

| | |
|---|--------|
| ARIZONA STATE OFFICE BU. LAND MANAGEMENT | |
| JUL 24 '72 | |
| SD | _____ |
| ASSOC. SO | _____ |
| PCS | _____ |
| RESOURCES | _____ |
| TECH SER | _____ |
| MGMT SER | _____ |
| PUB. AFF | _____ |
| CF | _____ |
| | ACTION |
| | INFO. |
| | SER ME |

Attention: Mr. Myron H. Allen

Re: Proposed Classification - A-6930.

Gentlemen:

In connection with the 102 Environmental Impact Statement being made by your office as part of the above proposed classification of proceedings, reference is made to your request for information regarding the involvement of the waters of the Bill Williams River in the interstate apportionment of Colorado River water.

Waters of the tributaries to the Colorado River located in Arizona are not subject to apportionment as interstate waters by the Secretary of the Interior. Congress, in the Boulder Canyon Project Act of 1920 apportioned mainstream water between various states and in the process declared its intent to exclude such waters from the apportionment. This intent has been confirmed by the United States Supreme Court in the case of *Arizona v. California*, 373 U.S. 546 (1963). The Court explicitly found that under the Boulder Canyon Project Act, the lower basin states have the right to regulate "the use of such tributary water" in a manner and for purposes not otherwise inconsistent with the Project Act or with Federal control of the Colorado River.

Accordingly, the use of waters of the Bill Williams River by appropriators along the stream and its tributaries are subject to regulation by the State of Arizona and are not a part of any apportionment of Colorado River waters under either interstate compact or Congress.

Arizona State Office
Bureau of Land Management

July 21, 1972

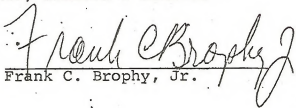
Page 2

Arizona governs the use of such waters by the doctrine of prior appropriation and a filing procedure which provides for notice to present vested water right holders and a hearing prior to issuance of a certificate formally recognizing a newly acquired right.

Yours very truly,

RILEY, CARLOCK & RALSTON

By


Frank C. Brophy, Jr.

FCB:lv

cc: Mr. Walter G. Smith

List of References

1. Vegetation and Flora of the Sonoran Desert. Forrest Shreve and Ira L. Wiggins: Standord University Press - 1964.
2. Water Resources of the Planet Ranch on Bill Williams River, Mohave and Yuma Counties, Arizona, Samuel F. Turner, Phoenix, Arizona, August 1962; Updated October 13, 1971.
3. Water Quality Standards for Surface Waters in Arizona
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6. Outdoor Recreation Resources Review Commission, National Recreation Survey, Report #19: U.S. Govt. Print. Off., 1962

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7. State of Arizona Arizona Statewide Comprehensive Outdoor Recreation Plan, 1973, Arizona Outdoor Recreation Coordinating Committee.
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9. Lowe, C. H. (ed.). 1964. The Vertebrates of Arizona. University of Arizona Press, Tucson.
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11. Hall, E. Raymond and Kelson, Keith R., Mammals of North America (2 vol.): Ronald Press Co., New York, 1959.
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13. United States List of Endangered Fauna, U.S. Department of the Interior, Fish and Wildlife Service, May 1974.

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20. Geological Survey Professional Paper 486-B, Precipitation, Runoff and Water Loss in the Lower Colorado River - Salton Sea Area.
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22. Reference Material on Planning Philosophies, Techniques and Procedures, by Simon Eisner, A.I.P., A.S.C.P., prepared for U.S. Department of the Interior, Bureau of Land Management, California State Office.
23. Model Cities Bill, Chapter 43, Senate Bill 8, passed by 29th Legislature, 1970.
24. Southwest Energy Study An Evaluation of Coal-Fired Electric Power Generation in the Southwest (Draft) April 1972.

Southwest Energy Study Report of the Meteorology Work Group, Appendix E, March 1972.
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27. New Towns: Policy Problems in Regulating Development. Institute of Public Administration, by John C. Gliege, Arizona State University, Tempe, Arizona, 1970.
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32. Planning and Development Districts and Socio-Economic Projects for the State of Arizona, Planning Division, Department of Economic Planning and Development (June 1970) State of Arizona.
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34. Mohave County, Arizona Subdivision Regulations, being a part of the Mohave County Planning and Zoning Ordinance. 1970.

Comments on Planet Townsite Draft Environmental Statement requested from:

Chief of Engineers, Department of the Army, Washington, D. C.
 Division Engineer, South Pacific Division, Corps of Engineers,
 Department of the Army, San Francisco, California
 District Engineer, Los Angeles District, Corps of Engineers,
 Department of the Army, Los Angeles, California
 Corps of Engineers, Department of the Army, Phoenix, Arizona
 Dr. T. C. Byerly, Office of the Secretary, Department of Agriculture,
 Washington, D. C.
 State Conservationist, Soil Conservation Service, Department of Agriculture, Phoenix, Arizona
 U. S. Water Conservation Laboratory, Agricultural Research Service,
 Phoenix, Arizona
 Dr. S. R. Galler, Deputy Assistant Secretary for Environmental Affairs,
 Department of Commerce, Washington, D. C.
 Director, Office of Economic Opportunity, Washington, D. C.
 Director of Impact Statements Office, Environmental Protection Agency,
 Washington, D. C.
 Regional Director, Region IX, Environmental Protection Agency,
 San Francisco, California
 Asst. Secretary for Health & Science Affairs, Department of Health,
 Education and Welfare, Washington, D. C.
 Mr. Charles Orlebeke, Deputy Under Secretary, Department of Housing and
 Urban Development, Washington, D. C.
 Regional Administrator, Department of Housing and Urban Development,
 San Francisco, California
 Mr. H. F. DeSimone, Asst. Secretary for Environment, Department of
 Transportation, Washington, D. C.
 Division Engineer, Arizona Division, Federal Highway Administration,
 Department of Transportation, Phoenix, Arizona
 Mr. James Elliott, Officer in Charge, United States Coast Guard,
 Parker Dam, California
 Mr. Jack O. Horton, Deputy Asst. Secretary for Programs, Department
 of the Interior, Washington, D. C.
 Mr. Webster Otis, Secretary's Field Representative, Department of the
 Interior, San Francisco, California
 Mr. Hardy Pearce, Environmental Review Officer, Secretary's Field Office,
 Department of the Interior, San Francisco, California
 Mr. George W. Webber, Member, Secretary's Field Committee, Bureau of
 Outdoor Recreation, San Francisco, California
 Mr. Ed Bullard, Member, Secretary's Field Committee, National Park
 Service, San Francisco, California
 Mr. J. Bruce Kimsey, Member, Secretary's Field Committee, Bureau of
 Reclamation, Sacramento, California
 Mr. F. Phillip Sharpe, Member, Secretary's Field Committee, Bureau of
 Reclamation, Boulder City, Nevada.

Mr. George Robinson, Member, Secretary's Field Committee, Geological Survey, Menlo Park, California
Mr. James Crowther, Member, Secretary's Field Committee, Bureau of Indian Affairs, Phoenix, Arizona
Mr. Homer C. Stewart, Member, Secretary's Field Committee, Bureau of Mines, Denver, Colorado
Geological Survey, Washington, D. C.
Advisory Council on Historic Preservation, Washington, D. C.
Bureau of Indian Affairs, USDI, Washington, D. C.
Bureau of Indian Affairs, Phoenix Area Office, Phoenix, Arizona
Superintendent, Colorado River Indian Agency, Bureau of Indian Affairs, Parker, Arizona
Colorado River Indian Tribes, Parker, Arizona
Bureau of Mines, Washington, D. C.
Bureau of Mines, Liaison Office, Phoenix, Arizona
National Park Service, USDI, Washington, D. C.
State Director, Arizona State Office, National Park Service, USDI, Phoenix, Arizona
Bureau of Outdoor Recreation, USDI, Washington, D. C.
Regional Director, Pacific SW Region, Bureau of Outdoor Recreation, San Francisco, California
Bureau of Reclamation, USDI, Washington, D. C.
Regional Director, Lower Colorado Regional Office, Bureau of Reclamation, Boulder City, Nevada
Project Manager, Arizona Projects Office, Bureau of Reclamation, Phoenix, Arizona
Project Manager, Parker-Davis Project, Bureau of Reclamation, Phoenix, Arizona
Bureau of Sport Fisheries and Wildlife, USDI, Washington, D. C.
Regional Director, Bureau of Sport Fisheries and Wildlife, USDI, Albuquerque, New Mexico
Mr. Wm. Rightmire, Acting State Supervisor, Bureau of Sport Fisheries and Wildlife, Phoenix, Arizona
Office of River Basin Studies, Bureau of Sport Fisheries and Wildlife, Phoenix, Arizona
Chief, Office of Public Affairs, Bureau of Land Management, USDI, Washington, D. C.
Director, Bureau of Land Management, USDI, Washington, D. C.
Director, Denver Service Center, Bureau of Land Management, USDI, Denver, Colorado
District Manager, Phoenix District, Bureau of Land Management, USDI, Phoenix, Arizona
Kingman Resource Area Manager, Bureau of Land Management, Kingman, Arizona
District Manager, Yuma District, Bureau of Land Management, Yuma, Arizona
State Director, Nevada State Office, Bureau of Land Management, Reno, Nevada
State Director, California State Office, Bureau of Land Management, Sacramento, California
District Manager, Riverside District, Bureau of Land Management, Riverside, California

Mr. John Lovell, Missoula District Office, Bureau of Land Management,
Missoula, Montana

Mr. John Radosta, Salem District, Bureau of Land Management, Salem, Oregon

Mr. Ben Avery, Member State Advisory Board for BLM, Phoenix, Arizona

Mr. Andrew Bettwy, Member, State Advisory Board for BLM, Phoenix, Arizona

Mr. Henry H. Haws, Member, State Advisory Board for BLM, Phoenix, Arizona

Mr. Ted Lee, Member, State Advisory Board for BLM, Thatcher, Arizona

Mr. John J. Levy, Member, State Advisory Board for BLM, Tucson, Arizona

Mr. Howard A. Twitty, Member, State Advisory Board for BLM, Phoenix, Arizona

Mr. David B. Thorud, Member, State Advisory Board for BLM, Tucson, Arizona

Mr. Tom Wardell, Member, State Advisory Board for BLM, Phoenix, Arizona

Mr. Desmond Wood, Member, State Advisory Board for BLM, Buckeye, Arizona

Mr. Arthur L. Arnold, Member, Phoenix District Advisory Board, Buckeye,
Arizona

Mr. Jack Clem, Member, Phoenix District Advisory Board, Chandler, Arizona

Mr. Chester C. Cofer, Member, Phoenix District Advisory Board, Kingman,
Arizona

Mr. J. J. Coughlin, Member, Phoenix District Advisory Board, Prescott,
Arizona

Mr. Fermin Echeverria, Member, Phoenix District Advisory Board, Phoenix,
Arizona

Mr. E. Laurence Narramore, Member, Phoenix District Advisory Board,
Palo Verde, Arizona

Mr. John J. Odle, Member, Phoenix District Advisory Board, Kingman, Arizona

Mr. Dale D. Smith, Member, Phoenix District Advisory Board, Chandler,
Arizona

Mr. N. Boyd Tenney, Member, Phoenix District Advisory Board, Prescott,
Arizona

Mr. Jack Wilson, Member, Phoenix District Advisory Board, Wikieup, Arizona

Mr. J. Leonard Neal, Member, Phoenix District .Advisory Board, Kingman,
Arizona

Hon. Barry Goldwater, United States Senate, Washington, D. C.

Hon. Paul J. Fannin, United States Senate, Washington, D. C.

Hon. John B. Conlan, United States House of Representatives, Washington, D.C.

Hon. John J. Rhodes, " " "

Hon. Sam Steiger, " " "

Hon. Morris K. Udall, " " "

Office of Hon. Harold Giss, Arizona State Senate, District 5, Phoenix, Arizona

Hon. Boyd Tenney, Arizona State Senate, District 1, State Capitol, " "

Arizona State Clearinghouse, Phoenix, Arizona

Advisory Commission on Arizona Environment, Phoenix, Arizona

Arizona Commission of Agriculture and Horticulture, Phoenix, Arizona

Arizona Game and Fish Department, Phoenix, Arizona

Arizona State Land Department, Phoenix, Arizona

Department of Library and Archives, State of Arizona, Phoenix, Arizona

Arizona State Bureau of Mines, Tucson, Arizona

Arizona State Parks, Phoenix, Arizona

Arizona Water Commission, Phoenix, Arizona

Chief, Budget Division, Nevada State Clearinghouse, Carson City, Nevada

Department of Conservation & Natural Resources, State of Nevada, Carson
City, Nevada

Nevada Department of Fish and Game, Reno, Nevada
Metropolitan Area & Clearinghouse, Clark County Regional Planning
Council, Las Vegas, Nevada
Office of the Lieutenant Governor (California State Clearinghouse),
Sacramento, California
Mr. Norman B. Livermore, Jr., Secretary for Resources, State of
California, Sacramento, California
State Land Commission, State of California, Los Angeles, California
California Fish and Game Commission, Sacramento, California
Southern California Association of Governments, Los Angeles, California
Maricopa Association of Governments, Phoenix, Arizona
Pima Association of Governments, Tucson, Arizona
Board of Supervisors, Mohave County, Kingman, Arizona
Board of Supervisors, Yuma County, Yuma, Arizona
Mr. Robert Baldwin, Planning Director, Yuma County, Yuma, Arizona
Town Council, Town of Parker, Arizona
Town Council, Lake Havasu City, Arizona
American Association of University Women, Tucson, Arizona
Arizona Association of Conservation Districts, Buckeye, Arizona
Arizona Cattle Growers Association, Phoenix, Arizona
Arizona Conservation Council, Phoenix, Arizona
Arizona Consulting Engineers Association, Phoenix, Arizona
Arizona Council of Engineering & Scientific Associations, Tucson
Region Committee, Tucson, Arizona
Arizona Desert Bighorn Sheep Society, Phoenix, Arizona
Arizona Ecology Club, Tucson, Arizona
Arizona Environmental Education Council, Inc., Phoenix, Arizona
Arizona Federation of Garden Clubs, Inc., Tucson, Arizona
Arizona Hotel & Motel Association, Phoenix, Arizona
Arizona Mining Association, Phoenix, Arizona
Arizona Parks & Recreation Association, Phoenix, Arizona
Arizona Roadside Council, Sun City, Arizona
Arizona Society of Professional Engineers, Phoenix, Arizona
Arizona-Sonora Desert Museum, Tucson, Arizona
Arizona-Sonora Desert Museum, Tucson, Arizona
Arizona State University Students Ecology Association, Tempe, Arizona
Arizona Wildlife Federation, Phoenix, Arizona
Arizona Zoological Society, Phoenix, Arizona
Arizonans in Defense of the Environment, Inc., Tempe, Arizona
Audubon Society, Tucson, Arizona
Mrs. Alice Schultz, Representative Audubon Society, Phoenix, Arizona
AWW Inc. (Arizonans for Quality Environment), Tucson, Arizona
California Wildlife Federation, Inc., Sacramento, California
Central Arizona Project Association, Phoenix, Arizona
Coalition of Arizona Students for the Environment, Tucson, Arizona
Committee on the Population Explosion, Grand Canyon, Arizona
Community Planning Coalition, Tucson, Arizona
Environmental Conscience, Inc., Phoenix, Arizona
Good Earth, Tucson, Arizona

Kingman Soil Conservation Service District, Kingman, Arizona
Lake Havasu Gem & Mineral Society, Lake Havasu City, Arizona
League of Arizona Cities and Towns, Phoenix, Arizona
Museum of Northern Arizona, Flagstaff, Arizona
National Wildlife Federation, Mr. N. A. Winter,, Phoenix, Arizona
Nature Conservancy, Tucson, Arizona
Nevada Wildlife Federation, Inc., Sparks, Nevada
Sierra Club Wilderness Office, San Francisco, California
Sierra Club, Southwest Office, Tucson, Arizona
Sierra Club, Grand Canyon Chapter, Tucson, Arizona
Southern Arizona Environmental Council, Tucson, Arizona
University of Arizona Student Chapter of the Wildlife Society, Tucson,
Arizona
University of Southern California Law Center Library, Los Angeles,
California
Valley Forward Association, Phoenix, Arizona
Wickenburg Natural Resources Conservation District, Wickenburg, Arizona
Western Rockhound Association, Inc. (Mr. Herman Sharp, 1st Vice Pres.)
Apache Junction, Arizona
Zero Population Growth, Inc., Glendale, Arizona
Dr. Robert Omart, Department of Zoology, Arizona State University,
Tempe, Arizona
Dr. Robert Durrenberger, Department of Geography, Arizona State
University, Tempe, Arizona
Reference Division, Phoenix Public Library, Phoenix, Arizona
The Wilderness Society, Washington, D. C.
Mr. James W. Allan, Tucson, Arizona
Arizona Public Service Company, Phoenix, Arizona
Arizona Ranch & Metals Co., Scottsdale, Arizona
Mr. Frank Brophy, Attorney for Arizona Ranch & Metals Co., Phoenix,
Arizona
Mr. John Lynch, Big Valley Land Co., Phoenix, Arizona
Mr. Donald C. Bulmer, Geologist, Tucson, Arizona
Burke, Hansen and Homan, Appraisers, Phoenix, Arizona
A. H. Carpenter, El Paso, Texas
H. Paul Friesema, Associate Professor, Public Land Project, Northwestern
University, Evanston, Illinois
Page Land & Cattle Co., Phoenix, Arizona
Lake Havasu Land Co., Phoenix, Arizona
McCulloch Properties, Inc., Los Angeles, California
Olympic Realty & Investment Co., Phoenix, Arizona
R. W. Pearson, Phoenix, Arizona
Ms. Nina Pollitt, Washington, D. C.
Land Commissioner, Santa Fe Railroad Company, Los Angeles, California
Southern Pacific Company, San Francisco, California
Les Ringenberg, Principal Planner, Advance Planning Division,
Maricopa County, Arizona
Jerzy Zaborski, Urban America Corporation, Phoenix, Arizona
Robert S. Lynch, Attorney, Phoenix, Arizona

Mr. Dennis Erhart, Planning Coordination Staff, New Mexico State Office,
Bureau of Land Management, Santa Fe, New Mexico
PACE Engineering, Inc., Phoenix, Arizona
Mr. John Stansel, Toups Engineering Company, Phoenix, Arizona
Mr. Harry Berg, Land Specialist, Phoenix, Arizona
Dr. Reed Wagstaff, Department of Geography, Arizona State University,
Tempe, Arizona
Mr. F. J. MacDonald, F. J. MacDonald & Associates (Member, Governor's
Commission on Arizona's Environment), Scottsdale, Arizona

APPENDIX F

Copies of Comments Received and BLM Responses Thereon

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ADVISORY COUNCIL
ON
HISTORIC PRESERVATION

WASHINGTON, D.C. 20240

August 1, 1973 AUG 13 73

Mr. Joe T. Fallini
State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

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| ARIZONA STATE OFFICE BLM LAND MANAGEMENT | |
| SD | |
| ASST. DIR. | |
| PCS | |
| RESOURCES | |
| TECH. SER. | |
| MGMT. SER. | |
| PUB. AFF. | |
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Dear Mr. Fallini:

This is in response to your request for comments on the environmental statement for the proposed Planet Townsite in Mohave County, Arizona. Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act of 1969, the Advisory Council on Historic Preservation has determined that your draft environmental statement is inadequate regarding our area of expertise as it does not contain sufficient information to enable the Council to comment substantively. Please furnish additional data indicating:

- a. Compliance with Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470(f)). The Council must have evidence that the most recent listing of the National Register of Historic Places has been consulted (see Federal Register, February 28, 1973, and monthly supplements each first Tuesday thereafter) and that either of the following conditions is satisfied:
 1. If no National Register property is affected by the project, a section detailing this determination must appear in the environmental statement.
 2. If a National Register property is affected by the project, the environmental statement must contain an account of steps taken in compliance with Section 106 and a comprehensive discussion of the contemplated effects on the National Register property. (Procedures for compliance with Section 106 are detailed in the Federal Register of November 14, 1972, pp. 24146-24148).
- b. Compliance with Executive Order 11593 of May 13, 1971.

1. In the case of land under the control or jurisdiction of the Federal Government, a statement should be made as to whether or not the proposed undertaking will result in the transfer, sale, demolition, or substantial alteration of potential National Register properties, such as the archeological sites to which reference is made on pages 26-27 of the draft environmental statement. If such is the case, the nature of the effect should be clearly indicated.
2. In the case of lands not under the control or jurisdiction of the Federal Government, a statement should be made as to whether or not the proposed undertaking will contribute to the preservation and enhancement of non-federally owned districts, sites, buildings, structures, and objects of historical, archeological, architectural, or cultural significance.

To insure a comprehensive review of historical, cultural, archeological, and architectural resources, the Advisory Council suggests that the environmental statement contain evidence of contact with the appropriate State Historic Preservation Officer and that a copy of his comments concerning the effects of the undertaking upon these resources be included in the environmental statement. The State Historic Preservation Officer for Arizona is Mr. Dennis McCarthy, Director, Arizona State Parks, 1688 West Adam, Phoenix, Arizona 85007.

Should you have any questions on these comments or require any additional assistance, please contact Robert Gamble of the Advisory Council staff.

Sincerely yours,


Ken Taamann
Compliance Officer

Response to Comments

by

Advisory Council on Historic Preservation

Comment: Additional data is needed concerning compliance with the National Historic Preservation Act of 1966 and Executive Order 11593 of May 13, 1971.

Response: See letter from Arizona State Parks dated December 18, 1973, and comments following that letter.

The statement has been revised to reflect the fact that no National Register quality sites will be directly affected. One site (Swansea Townsite) is in the process of being nominated to the National Register of Historic Places. Although this site is outside of the proposed exchange, it will be indirectly affected and a 196/2b statement of effect will be prepared prior to a land exchange.

The statement has also been revised to reflect the fact that an intensive cultural resource inventory of the Federal lands proposed for exchange was done in 1972 by Prescott College.

A review of the National Register of Historic Places as well as Yuma and Phoenix District (BLM) cultural resource inventory records reveal no sites of National Register significance (other than Swansea Townsite) on lands not under BLM control. The Swansea Townsite is on land offered in exchange for Federal lands. In this instance a possible National Register site will come under complete Federal ownership (the site is on both Federal and private land).

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

6029 Federal Building, Phoenix, Arizona 85025

May 9, 1973

Mr. Joe Fallini
State Director
Bureau of Land Management
U. S. Department of Interior
3022 Federal Building
Phoenix, Arizona 85025

Dear Mr. Fallini:

The draft environmental impact statement for the proposed Planet townsite in Mohave County, Arizona, was referred to the Soil Conservation Service for review and comment.

The statement is well written, but is based on several possibilities which are stated on page 2 as follows:

"Preliminary plans for development include the following items; however, there is no guarantee that this is the kind of development that would occur if the proposed land exchanges are consummated. There is also a possibility that Arizona Ranch and Metals Company could sell their interest to other developers who could completely redesign the proposed town."

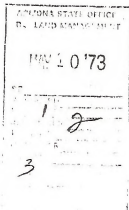
Although some information is included on soils, floodplains and flood control needs, it will be necessary to study the final plans for the development before specific comments can be made. Individual site investigations will be necessary by the developer to determine if the soils are acceptable for septic tank systems. Review of detail plans will indicate if adequate provisions are made to control or protect the development from flooding.

We appreciate the opportunity to review and comment on this proposed project.

Sincerely,

George C. Marks

George C. Marks
State Conservationist



Response to Comments

by

Soil Conservation Service
United States Department of Agriculture

Comment: It will be necessary to study the final development plans before specific comments can be made regarding acceptability of soils for septic tanks and to determine if adequate provisions are included to control or protect the development from flooding.

Response: Final plans for development have not been made and would not be until after the proposed exchanges are consummated. Arizona Ranch and Metals Co. has not done detailed planning regarding acceptability of soils for septic tanks.

Information concerning septic tanks, their use and effects can be found in a study made by Drs. Winneberger and Klock, entitled "Current and Recommended Practices for Subsurface Waste Water Disposal Systems in Arizona," published in July of 1973 under the auspices of the Engineering Research Center, College of Engineering Sciences, Arizona State University. Most of the suggestions contained in that study with respect to the installation and maintenance of septic tanks for subdivision developments have been adopted in recent regulations promulgated by

Soil Conservation Service, cont'd

the State Health Department (exhibit K).

These regulations have imposed a more strict requirement than the Report in connection with permeability tests, calling for such a test on each lot where a septic tank is to be installed. Development will be in accordance with appropriate county, State, and Federal flood control regulations.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, CORPS OF ENGINEERS
630 Sansome Street, Room 1216
San Francisco, California 94111

SPDPD-R

28 June 1973

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

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| ARIZONA STATE OFFICE | |
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Dear Sir:

This is in response to your notice requesting Corps of Engineers review and comments on the draft environmental statement for the proposed Planet Townsite in Arizona. In accordance with our review procedures, this letter shall serve as the consolidated response of the District Engineer, Los Angeles, and the Division Engineer, South Pacific.

The proposed plan does not conflict with existing or authorized plans of the Corps of Engineers. Recognizing that such aspects are outside the Corps of Engineers area of responsibility, based upon experience with environmental statements for similar actions, we would like to make the following comments and suggestions:

a. The discussion of impacts appears to be so general that an evaluation of the environmental benefits and detriments of the proposed action is difficult.

b. It is acknowledged on the bottom of page 2 that once the proposed land exchanges are consummated, the development plan could significantly change, thereby possibly opening the door for an action that could be more environmentally adverse than that currently proposed and covered by this environmental statement. In view of this, it would appear appropriate for BLM to insure certain controls in making the land exchange, such as requiring that a second EIS be prepared if the ultimate plan differs significantly from that currently proposed.

28 June 1973

c. Information on historical sites should be included.

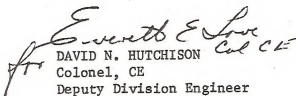
d. Although the statement notes (on page 41) that there will be a significant impact upon water quality because of contamination of groundwaters, nothing is presented which would indicate what measures will be utilized to mitigate such circumstances. Mitigation measures should be discussed in the statement.

e. A brief description of the proposed methods of sewage treatment should be included. Methods of sewage effluent disposal, together with any effects, whether beneficial or adverse, upon groundwater quality, should also be discussed.

f. In view of the apparent adverse impacts on lands and resources outside the actual townsite, it would appear desirable to study and take measures appropriate to prevent or minimize such adverse impacts.

Thank you for the opportunity to review and comment on the draft environmental statement for this proposed action.

Sincerely yours,


DAVID N. HUTCHISON Col CE
Colonel, CE
Deputy Division Engineer

Response to Comments

by

South Pacific Division, Corps of Engineers

- Comment: Discussion of impacts is too general and proposed plan of development could change. Suggest that if plans change significantly, BLM require a second EIS be prepared.
- Response: Once lands pass from Federal ownership there is nothing BLM could do to regulate development even if a second EIS was prepared. As there would be no Federal action involved there would be no reason for preparation of a second EIS.
- Comment: Information on historical sites should be included.
- Response: Text has been revised to include such information.
- Comment: Should list mitigation measures for impact on water quality.
- Response: Mitigating measures are listed.
- Comment: Should describe methods of sewage treatment.
- Response: Sewage treatment plans are discussed under the Description of the Proposal. Individual septic tank systems will be developed at each homesite.
- Comment: Should study and take measures necessary to prevent or minimize adverse impacts outside the townsite.
- Response: The EIS indicates potential adverse impacts outside the townsite which may require additional Federal action if the townsite is developed (for example, closure of certain areas to off-road vehicles on Federal lands).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
100 CALIFORNIA STREET
SAN FRANCISCO, CALIFORNIA 94111

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix AZ 85025

Dear Sir:

The Environmental Protection Agency has reviewed the draft environmental impact statement on the Planet Townsite dated March 29, 1973.

The Environmental Protection Agency believes that the draft statement does not contain sufficient information to assess fully the environmental impact of the proposed action. However, from the information submitted, the agency is able to make a preliminary determination of the impact on the environment and has reservations concerning the environmental aspects of the proposed action. Specific comments are enclosed. We have classified our comments as ER-2. This rating will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act.

Definitions of the categories are provided on the attachment. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the impact statement at the draft stage.

If you have any questions concerning our categorization procedures, please let us know.

We would appreciate receiving a copy of your final statement.

Sincerely,

for *Frank M. Covington*
Paul De Falco, Jr.
Regional Administrator

Enclosures

-2-

cc: Council on Environmental Quality, Washington, DC

Review and comment on the draft Environmental Impact Statement for the proposed Planet Townsite prepared by the Bureau of Land Management.

The environmental effects of a new community on the Bill Williams River should be evaluated in the context of the ongoing and planned development of the surrounding area. Air quality in the Lower Colorado area will be affected by the continued development of Lake Havasu City, Parker and the Parker Strip, and the new development of the Chemehuevi Indian Reservation. Air quality in the Planet Townsite area may also be affected by the continuing development in the Fort Mohave-Bullhead City area. The statement should attempt to assess the probable air quality deterioration which will take place as the result of more new developments in the area, and whether or not this development will pose a threat to the maintenance of air quality standards. There should also be a discussion of the conformance of the Planet Townsite development with the State Air Implementation Plans being prepared by the States of Arizona, California and Nevada.

The statement makes it clear that the plans for development of the Planet Townsite are preliminary and that there is no guarantee that the ultimate development will conform to these plans. Because of the significance of the measures planned to mitigate the adverse environmental effects of the proposed development, the statement should consider the alternative of placing environmental conditions on the land exchange to ensure that maximum possible mitigation measures are incorporated into the new community.

Response to Comments

by

Environmental Protection Agency

Comment: Impacts should be evaluated in context of ongoing and planned development in the surrounding area regarding air quality.

Response: Text has been revised.

Comment: Consider placing environmental conditions on the land exchange.

Response: The Bureau cannot place enforceable environmental conditions in the patent.

The control on how privately owned land is used and developed is the responsibility of local government, and they have the authority and responsibility under State law and through local planning and zoning regulations and building codes, to place environmental conditions on the development of private lands to insure that mitigating measures are incorporated into a new community.



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

REGIONAL OFFICE

50 FULTON STREET
SAN FRANCISCO, CALIFORNIA 94102

ARIZONA STATE OFFICE
B. LAND MANAGEMENT

OFFICE OF
REGIONAL DIRECTOR

June 4, 1973

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 No. First Ave.
Phoenix, Arizona 85025

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| CD | |
| ASSOC SD | |
| PCS | |
| RESOURCES | |
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| MGMT SCR | |
| PJB AFF | |
| CF | |
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| | INFO. |
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Re: Planet Townsite - Draft Environmental Statement (DES 7318)

Dear Sir:

The above referenced material has been received by this office in accordance with this agency's guidelines for compliance with the National Environmental Policy Act, P.L. 91-190.

The proposed action describes an exchange of public land for similarly valued private land. If completed, this land exchange may permit the development of a new townsite with an ultimate population of approximately 20,000 persons.

The statement identifies the recreational potential and devotes considerable space to this facet of the proposed development. The projected population will apparently be at or near retirement age, although younger families may be expected. The need for educational facilities is mentioned with sites for four elementary, one junior and one senior high schools. These are to be delayed until adequate population levels are reached to require their construction.

Assuming that the majority of the population will be in the over 40 year age group, adequate medical and hospital services should be available. The climatic extremes are such that dependence should not be placed on services at remotely located centers, such as Lake Havasu City or Parker. The time-distance factor may well be too great for adequate medical care.

The opportunity to review this statement is appreciated.

Sincerely,

Fernando E.C. De Baca
for
Fernando E.C. De Baca
Regional Director

Response to Comments

by

Department of Health, Education, and Welfare

Comment: Points out that adequate medical and hospital facilities should be available.

Response: Medical services and resources available at the present time to prospective new inhabitants of the proposed community consist of three doctors in Parker and six in Lake Havasu City; three osteopathic doctors in Parker and two in Lake Havasu City; two dentists in Parker and four in Lake Havasu City; two optometrists in Parker and one in Lake Havasu City. There is one hospital in Parker with a capacity of 36 beds, one hospital in Lake Havasu City accredited with the Arizona Hospital Association containing 34 beds, and in addition, there are two hospitals in Blythe and an 83-bed hospital in Kingman.

JAMES A. HALEY, FLA., CHAIRMAN

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 ABRAHAM KAZEN, JR., TEX.
 ROBERT S. STEPHENS, JR., GA.
 JOSEPH P. VIGORITO, PA.
 JOHN MCLEOD, MONT.
 TEND RONGALJO, WYO.
 JONATHAN B. BINGHAM, N.Y.
 JOHN F. EDENBERG, OHIO
 HAROLD RUMMELS, N. MEK.
 YVONNE BRATHWAITE BURKE, CALIF.
 ANTONIO BORJA WON PAT, GUAM
 WAYNE OWENS, UTAH
 RON DE LUZO, V.I.
 JAMES R. JONES, OKLA.

JOHN P. SATLOR, PA.
 CRAIG ROSSER, CALIF.
 JOE EUBITZ, KANS.
 SAM STEINER, ARIZ.
 DON H. CLAUSEN, CALIF.
 PHILIP E. RUPPE, MICH.
 JOHN H. HAPPEY CAMP, OKLA.
 MANUEL LUJAN, JR., N. MEK.
 JOHN DELLENBACK, OREG.
 KETTY G. SEBELIUS, KANS.
 RALPH S. REDULA, OHIO
 ALAN STERLMAN, TEX.
 JOSEPH J. MARAZITI, N.J.
 DAVID TOWELL, NEV.
 JAMES S. MARTIN, N.C.
 WILLIAM M. KETCHUM, CALIF.
 PAUL W. CROHN, MASS.
 DON YOUNG, ALASKA

COMMITTEE ON INTERIOR AND INSULAR AFFAIRS

U.S. House of Representatives
 WASHINGTON, D.C. 20515

May 9, 1973

SIDNEY L. MCFARLAND
 STAFF DIRECTOR AND CLERK
 LEWIS A. SIGLER
 GENERAL COUNSEL
 CHARLES LEPPERT, JR.
 MINORITY COUNSEL

Mr. Joseph Fallini
 Arizona State Office
 Bureau of Land Management
 Room 3204 Federal Building
 230 North 1st Avenue
 Phoenix, Arizona

Dear Mr. Fallini:

A review of the draft environmental statement concerning a proposed Federal-State-private land exchange in the Bill Williams area of Western Arizona convinces me that any such exchange should be deferred until land use planning and other factors have been considered.

The Congress is now considering national land use planning legislation which provides for grants-in-aid to the States to institute land use planning processes within their borders. The Subcommittee on the Environment of the Committee on Interior and Insular Affairs of the U.S. House of Representatives, which I have the honor to chair, expects in the near future to report out a bill to accomplish this purpose, and the Senate counterpart Committee is developing similar legislation.

Although Arizona so far has not more than what is essentially a beginning study of problems of land use planning, with virtually no legislative guidelines being set forth, I believe that, under the new legislation, the State eventually will take advantage of the Federal incentives and begin development of a program long overdue. It would be a travesty if a project such as

ARIZONA STATE OFFICE
 BUREAU OF LAND MANAGEMENT
 MAY 14 '73
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 ASSOC. SD 2
 PCS 3
 RESOURCES 4
 TECH SER 5
 MGMT 6
 ACTION 7
 SEE ME 8

Mr. Joseph Fallini

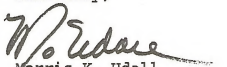
May 9, 1973

the proposed new city near the Planet Ranch in Mohave County were allowed to proceed without the benefit of a land use planning program which would extend beyond the boundaries of the townsite itself. It would be all the more a tragedy if Federal public lands under your jurisdiction and State lands were committed to this project without the thorough thinking-through a Statewide land use planning process could provide.

This is to request, then, that the Bureau of Land Management defer action on the proposed exchange at the present time. I am writing to the Department of Economic Planning and Development and to the State Land Commission urging deferral at the State level also; and I am communicating with the Supervisors of both Mohave and Yuma Counties, pointing out to them, among other things, that, as is stated in the draft environmental statement, development of a large scale new community may cost present residents more money via taxes than the community contributes to the tax rolls.

It is my hope that our Subcommittee may hold some field hearings at or near the site of the proposed new city this summer, at which time we may be able to develop additional information on the basis of which sound decisions may be made in the future. But for now, I think deferral of action is called for.

Sincerely,


Morris K. Udall
Chairman, Subcommittee
on the Environment

Response to Comments

by

Hon. Morris K. Udall
U. S. House of Representatives

Comment: Congress is considering national legislation on land use planning. Requests decision on proposed exchange be deferred.

Response: See following letter dated May 24, 1973, from Arizona State Director, BLM.

Comment: Points out that cost to the county may cost the present residents more money than the new community would contribute.

Response: The following statement has been offered by Mr. Frank Brophy, Jr., on behalf of AR&M:

"The company has made some effort to study the question of fiscal impact of the proposed new community upon county finances. We are unaware of any studies which might shed some light on this matter, but have briefly discussed the question with engineering personnel involved in similar projects. The consensus of opinion appears to be that a properly developed community with appropriate public improvement districts should not be a drain upon the local county government but an asset. We know of no claim being made to the effect that Lake Havasu City is a drain upon the finances of Mohave County. We believe the opposite to be true. Most of the expensive governmental functions of Lake Havasu City are covered by local funds raised through the Lake Havasu Irrigation and Drainage District. Fountain Hills, a somewhat comparable community east of Phoenix and Scottsdale, has formed a sanitary district, four road improvement districts and a public utility water company. These costs are thus borne either by the developer or the landowner while the community is getting established. The principal cost to the county in these communities is the cost of providing police protection. Most of the other county costs are directly related to population, and it is difficult to ascertain the basis for a complaint based on

Morris K. Udall, cont'd

the occupation of land by individuals since it is the primary purpose of county government to serve such people, and in theory such people, unless they are on welfare, pay for the services extended to them by the county. There was recent public criticism of the community of Sun City by the Phoenix Chamber of Commerce upon the grounds that Sun City was a drain upon county finances and should incorporate to relieve the county taxpayer of this unfair burden. The criticism was not substantiated by any studies or factual data, but in view of the character of Sun City and the sources of county funds, it is more likely that Sun City contributes more to county finances than it receives in comparison with other areas of the county.

"The Arizona Legislature has provided many means whereby a community can finance and pay for many services and facilities which would otherwise be provided by municipalities or county governments: For example, A.R.S. 45-2301, et seq., provides for flood control districts; A.R.S. 11-701, et seq., provides for county improvement districts for the improvements of roads, sidewalks, drainage systems, pipes, hydrants, and appliances for fire protection, sewers, and sewage facilities, domestic water systems, and street lighting systems; A.R.S. 36-1231 provides for a district for the construction and operation of hospitals; A.R.S. 36-1301, et seq., provides for the establishment of a sanitary district to construct, maintain, and operate a sewage system and garbage disposal system; and A.R.S. 9-1001, et seq., provides for the formation, maintenance and financing of voluntary fire companies. All of these districts are supported by taxes levied upon the lands within the districts who are to receive the benefits of the services provided by the districts. The counties act as fiscal agents for handling the tax moneys raised to finance the operations of such districts. Such districts should not be considered a burden upon the county but a burden only upon the taxpayers directly benefitted by the district. In addition to the districts there is the initial possibility open to a developing community for contract services in the field of security and fire protection. At present in the Fountain Hills development, McCulloch Properties, Inc., contracts with the Rural Fire Department, a privately held public utility, for security and fire protection. Similar arrangements may be possible during the early stages of the proposed new community.

"While the company has not considered the exact manner in which the development would be financed, it should be noted that if McCulloch Properties, Inc., undertakes to develop the community, that company's past history indicates a use of such districts to support various public services for its communities."



United States Department of the Interior

IN REPLY REFER TO

BUREAU OF LAND MANAGEMENT

1792 (911)
Planet Townsite

State Office
3022 Federal Building
Phoenix, Arizona 85025

May 24, 1973

Hon. Morris K. Udall
Chairman, Subcommittee on the Environment
Committee on Interior and Insular Affairs
U.S. House of Representatives
Washington, D. C. 20515

Dear Mr. Udall:

This is to acknowledge receipt of your letter of May 9, commenting on the draft Environmental Statement concerning the proposed Federal-State-private land exchange in the Bill Williams area.

This exchange proposal was initiated several years ago by the Arizona Ranch and Metals Company who desire to block up their private land holdings in the Planet Ranch area for development of a new town. The State Land Department has filed an exchange application for Federal lands that lie on the border of the proposed townsite, in order to obtain potential high value lands for the benefit of the State School Trust fund. The Mohave County Board of Supervisors supported the proposed exchanges and new town development.

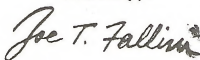
The proposed land exchanges would have certain benefits for the Federal Government. The Arizona Ranch and Metals Company owns many parcels of land along the Bill Williams River Valley, many of which have important wildlife values. One of these tracts would make a valuable addition to the Lake Havasu National Wildlife Refuge. The Arizona Ranch and Metals Company can proceed with development of their private lands whether or not an exchange is made. There are about 3900 acres of Federal lands intermingled and surrounded by State and private lands which would be isolated if urban development proceeds without the exchange. We therefore were willing to consider the proposal to consolidate the private, State, and Federal lands in the vicinity and analyze the impact this would have on the area. Our draft Environmental Statement is an attempt to analyze this impact.

We have received a number of comments from interested agencies, organizations, and individuals. We plan to discuss these comments and reevaluate the exchange proposal with State officials, the Mohave County Board of Supervisors, and the exchange proponents. It will be several months

before the final Environmental Statement is prepared.

We appreciate receiving your comments and recommendations. We will consult further with you before a decision is made on the proposed exchange.

Sincerely,

A handwritten signature in cursive script that reads "Joe T. Fallini". The signature is written in dark ink and is positioned below the word "Sincerely,".

Joe T. Fallini
State Director

cc:
Ariz Adm. Asst. Pray
Director, w/cy related corres.
DM, Phoenix District, w/cy
related corres.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
AREA OFFICE
2500 WILSHIRE BOULEVARD, LOS ANGELES, CALIFORNIA 90057

AREA OFFICES:
Los Angeles, California
San Francisco, California

REGIONAL IX
REGIONAL OFFICE
SAN FRANCISCO, CALIFORNIA

MAY 31 1973

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IN REPLY REFER TO:
9.2PP - J. Furstenthal
Telephone: 688-5856

Mr. Joe T. Fallini
State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, Arizona 85025

Dear Mr. Fallini:

Subject: Comments on Draft Environmental Statement for
the Proposed Planet Townsite (DES 73 18)

This proposal involves the exchange of approximately 9,646 acres of Federal lands in Mohave County, Arizona for State and private lands. The exchange will permit the development of a new town in the vicinity of the existing Planet Ranch on the Bill Williams River. The site is approximately 13 miles east of Parker Dam. The townsite would involve about 11,980 acres and permit the eventual use of the town by 7,000 families.

It is the conclusion of this office that although the statement has adequately addressed the immediate environmental impact of the project, insufficient emphasis has been placed on the long range urbanization of the area that may be generated as a secondary impact of the project. It also appears that there has been little contact with the State Department of Economic Planning and Development and the Counties of Mohave and Yuma regarding the long range land use planning of those agencies.

COMMENTS:

1. It is indicated that land use controls over topographic changes are infeasible and that the land could be completely cleared by the private developers. If the preservation of topographic features is considered an important environmental asset, governmental control

could be exercised through the subdivision, design, and permit review processes. It is a primary responsibility of public agencies to ensure that there is coherence in land use development within their jurisdictions. Increasingly, the importance of this responsibility is being recognized.

2. The statement is inconsistent in its treatment of the economic objectives of the new town. On the one hand, it is stated that no industry is planned, while elsewhere stating that industry may be inevitable and that the community could support "small industries". In this area, controls could also be exercised by the Interior Department or the State and local governments if it is determined that industrial development would be more detrimental than beneficial to the environment in the vicinity of the new townsite.

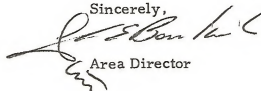
3. The problem of providing a range of new governmental services is addressed but not quantified. An investigation of the incremental costs of providing services to the new town should be made and projected costs weighed against reasonable expected revenues from taxation.

4. The land use control proposed to prevent construction of residences with fewer than 1,200 square feet of living space appears exclusionary by implicitly prohibiting the construction of low-cost housing.

5. The "No Action" alternative to the proposed development implies that urban development is inevitable at this location and that planned growth is preferable to haphazard growth. While this may be the case, urban development controls could be exercised to control growth significantly, even if the land exchange is not consummated. We re-emphasize the responsibility of public agencies to direct land use.

We appreciate the opportunity to comment on the Draft Environmental Statement for the Planet Townsite. We hope that you will send a copy of the Final Statement to us upon completion.

Sincerely,

A handwritten signature in dark ink, appearing to read "R. E. Brown", is written over the typed name "Area Director".

Area Director

Response to Comments

by

Department of Housing and Urban Development

- Comment: The draft does not place sufficient emphasis on the secondary impacts of the proposed townsite.
- Response: The statement acknowledges that there may be secondary impacts caused by additional development of communities similar to the proposed Planet Townsite if the Planet Townsite is successful.
- Comment: It appears there has been little contact with DEPAD or the counties involved.
- Response: See letter dated June 25, 1973, from Ryley, Carlock and Ralston, in Appendix F.
- Comment: It is a primary responsibility of public agencies to insure coherence in land use development within their jurisdictions.
- Response: Environmental consideration will be considered in making a decision on the proposed exchange. However, if the exchange is consummated and the land proposed for development becomes private, the ultimate decision for the development of a townsite will be the responsibility of various State and county planning and zoning bodies.
- Comment: The statement is inconsistent in its treatment of economic objectives of the new town.
- Response: At this time no industry is planned. The statement recognizes that even though none is planned, plans may change and there is a possibility that some sort of light industry may develop.
- Comment: A study comparing costs against expected revenue from taxation should be made.
- Response: See letter in Appendix F from Ryley, Carlock and Ralston, dated June 25, 1973.

Department of Housing and Urban Development, cont'd

Comment: Planned development will prohibit the construction of low cost housing.

Response: The purpose of the development is not designed for low-cost housing.

Comment: Statement indicates development is inevitable.

Response: See letter mentioned above.



DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
FEDERAL HOUSING ADMINISTRATION
PHOENIX INSURING OFFICE
244 WEST OSBORN ROAD
PHOENIX, ARIZONA 85013

REGION IX
450 Golden Gate Avenue
P.O. Box 36003
San Francisco, California 94102

May 2, 1973

IN REPLY REFER TO:

PWV

Re: Draft Environmental Impact State-
ment, Proposed Planet Townsite,
Mohave County, Arizona

Mr. Joe Fallini, State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, Arizona 85025

Dear Mr. Fallini:

We have reviewed the draft EIS for the proposed Planet Townsite. Please be advised that we find that no significant adverse environmental impacts will be exerted upon the proposed residential area. While it is clear that residential land use will exert some adverse impact on wildlife, vegetation and the undisturbed character of adjacent lands, we would expect other reviewing agencies whose primary responsibility relates directly to adjacent environment to comment adequately on such impacts.

We appreciate the opportunity of reviewing and commenting on the Draft EIS.

Sincerely,

Merritt R. Smith
MERRITT R. SMITH
Director

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| ARIZONA STATE OFFICE B. LAND MANAGEMENT | |
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| TO | |
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Response to Comments

by

Department of Housing and Urban Development

Comment: Do not feel that the proposed development will
adversely affect the environment.

Response: None



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
BUREAU OF SPORT FISHERIES AND WILDLIFE
POST OFFICE BOX 1306
ALBUQUERQUE, NEW MEXICO 87103

IN REPLY REFER TO:
DU. LAND MANAGEMENT

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5, 1973

MEMORANDUM

May 25, 1973

To: State Director, Bureau of Land Management
Arizona State Office, 3022 Federal Building
230 N. First Avenue, Phoenix, Arizona 85025
Acting

From: Regional Director, Region 2

Subject: Review of EIS: Planet Townsite, Mohave County, Arizona
(DES-73/18)

We have reviewed the subject draft and, as you are aware, this proposal and associated aspects will have significant impacts on our Havasu National Wildlife Refuge. To begin with, we will address our comments to the refuge impacts.

The townsite in question is five or six miles up the Bill Williams River from the present east boundary of the Bill Williams Unit of the Havasu National Wildlife Refuge. It is quite evident that the Bill Williams Unit will be strongly affected by the development of a city of 20,000 people in that close a proximity; however, the nature and character of the lands within the refuge, and those that are proposed to be converted from private ownership to federal ownership in the exchange transaction, are such that they may be partially protected from the public if adequate precautions are taken in the construction and location of the state highway (page 17) which will serve the new city and in the use these people make of the refuge.

It will be extremely important to the future welfare of wildlife and refuge management in the Bill Williams Unit that the highway be constructed with controlled access through the entire stretch extending through the refuge. A considerable portion of the existing refuge has been nominated for designation as a Research Natural Area. This will hopefully give it additional protection.

The most important feature of the proposed exchange of lands as far as the Havasu Refuge and the wildlife thereon is concerned is the fact that the Arizona Ranch and Metals Corporation proposes to relinquish to the Federal Government for refuge purposes at least 560 acres of ranch lands, both developed and undeveloped, which include the entire lower Planet Ranch complete with irrigation wells. This will provide the

Bureau of Sport Fisheries and Wildlife with a long needed acreage of lands already cleared, developed and irrigated. It is possible for this Bureau to work out cooperative agreements with the Planet Ranch to continue this or a similar operation on the lands that will not be relinquished to the Federal Government in order to keep these lands productive of waterfowl values, primarily for the Canada goose.

We are presently moving to request additional withdrawal in the Bill Williams to complement these lands. Our Refuge Division, therefore, has been in favor of this exchange transaction since its inception a few years ago, partly on the basis that the Planet Ranch people had succeeded in acquiring most of the bottomlands up and down the Bill Williams River together with the water rights that accrue to them and therefore were primary owners of practically all of the riparian lands of any value to wildlife in the Bill Williams river bottom, upstream from the Bill Williams Unit of the Havasu Refuge.

The Arizona Ranch and Metals people have only one other alternative (page 79) to exchanging with the Federal Government for a solid block of land at a higher location, which is to exploit the lands already acquired in the river bottom. This would destroy the future potential for the Bureau's management of Canada geese on any portion of the Planet Ranch lands, and would require an intensive and costly development on the part of this Bureau in order to secure the wildlife benefits. The Arizona Ranch and Metals people, having invested to the extent that they have in the Bill Williams bottom lands areas, would have no alternative but to seek to get their money back on the original investment by moving towards the highest returns possible on the lands that had been acquired in the river bottom proper.

There should be some study made, we feel, of the return flows that will be passed back to the underground water supply in the Bill Williams so that some forecast could be prepared as to the actual water use and its effect on the habitat in the refuge. The most important feature should be on arrangement for a sustained minimum flow of water out of Alamo Dam in order to at least maintain the supply of underground water in the Bill Williams aquifer beneath the river bed.

Unquestionably there will be other adverse effects of the development of a city at the Planet site. Generally speaking, we believe that the development of the Planet city site as described in this EIS will be preferable to any kind of development that might otherwise be anticipated along the river bottoms. We are certain that adverse effects will be felt in the pressures of people traffic up and down the Bill Williams River through the refuge and that there will certainly be additional requirements for control of public use by wheeled vehicles and by people engaged in other than program related uses. Again, these effects will

probably not be as serious as they would be if the development were contained in the bottom lands. The additional acreages of private lands that may eventually become Bureau lands in the exchange will compensate in some measure for the increased problems brought about by people, because these lands will be managed primarily for their wildlife values and can be protected basically from adverse effects, provided, of course, water supplies do not diminish and wipe out riparian vegetation in the lower reaches of the Bill Williams River.

In addition to the above comments, which primarily involve our refuge program, we offer the following comments.

The maps in this draft are inadequate in several regards.

1. Map 2, 3 and 5 should clearly delineate the Bill Williams Unit of the Havasu NWR by using a zip-o-tone overlay. These maps now show an unidentified boundary which, if it indicates the refuge boundary, is incorrect. The lands along Lake Havasu north of the Bill Williams Unit were deleted from the Havasu NWR a number of years ago.
2. Map 2 & 3 should clearly show a number of facilities mentioned in the text but not shown on any map: the power lines, gas line, access road to Lake Havasu and airstrip mentioned on page 4; highways 95 and 93, Yuma County Road, Mohave County Road, BR transmission line and El Paso natural gas line on page 17.
3. Map 3. The first symbol (Federal land desired by the State) does not appear any place on this map. The reader must assume it's the same as the last symbol (Federal lands desired by both State and Private).
4. Map 5 does not identify the stippled area. Delete "Lake" from name of Havasu NWR.

On page 20 in the third paragraph, the value of the flood plain for nesting white-winged doves should be stressed. Nesting habitat for this valuable migratory game bird is rapidly being destroyed in Arizona and this is of grave concern of State and Federal wildlife agencies.

In the last sentence on page 20 "maybe" should be changed to "is". The Bill Williams River, particularly at the delta, is one of the prime known habitats of the endangered Yuma clapper rail.

In the third paragraph on page 22, the Bill Williams Unit of the Havasu NWR should be specifically named. The BSF&W has an application on file

with BLM to withdraw a part of Area A on page 22 to enlarge the Bill Williams Unit. This pending application, as it may be amended, should be noted here and elsewhere in the EIS where appropriate.

On page 24, the Havasu NWR is credited with 27 miles of Havasu Lake shoreline in Arizona. Since the main body of Havasu Lake was deleted from the refuge, only about 8 miles of shoreline remain under refuge administration; about 3 miles at the Bill Williams Unit and about 5 miles at the upper end of the lake below Topock Gorge.

The description of Area F on page 24 leaves the false impression that most of the riparian land along the Bill Williams River is in private ownership. Actually, most of this riparian land is within the Bill Williams Unit of the Havasu NWR and should be clearly shown on Maps 2, 3 and 5.

On page 28, mining is mentioned as an important industry in Mohave County, yet no mention of mining is made on pages 36-37 where economic conditions are discussed.

Paving the primary access road from Lake Havasu (page 4) to provide access to the proposed townsite will create major impacts on the Bill Williams River. The present road alignment is not suitable for improvement without considerable modification to both the vertical and horizontal alignments to meet State and Federal road standards. Upgrading this road will entail making large cuts and fills in the hilly area and will undoubtedly encroach on the riparian river bottom habitat.

The sanitary land fill for the development will evidently be on public lands. We wonder why this use is not confined to the private holdings, rather than BLM?

The water investigation made by Turner and Associates (page 11) was made in 1962. This was prior to Alamo Dam and there is reason to believe that the ground water systems have changed to some degree since that time. It would appear that other alternate sources of water should be discussed, including subsequent impacts. The excessive utilization of ground water may cause further deterioration of the river's riparian vegetation.

The increased ground water utilization, septic tank drainage, and sewage plant effluents, as well as irrigation of farm lands, will cause an increase in TDS in both the ground water and surface water of the Bill Williams drainage which will add to the already critical salt problem in the lower Colorado.

We note that the flora and fauna lists provided in Appendix A do not include a listing of the avifauna, although the "wildlife" section on page 18 indicates a bird listing is included. The mammal list includes one threatened species (Spotted Bat) and two undetermined or peripheral status subspecies (Yuma Cougar and Mexican Pronghorn).

The draft does discuss certain aspects regarding the pronghorn but does not address itself to the threatened spotted bat or the Yuma lion. These should be given further consideration and clarification.

The existing pattern of land ownership makes it difficult, if not impossible, to properly manage the existing resources but it would not necessarily prevent private development, which in turn would create greater problems. It appears that an exchange may be the most acceptable solution for all concerned. However, on page 2 of the draft there appears a very key statement, "There is also the possibility that Arizona Ranch and Metals Company could sell their interests to other developers who could completely redesign the proposed town." This is an honest recognition of a rather common practice. The draft should address this possibility by indicating what steps could be taken to either lessen this possibility or what will be done to safeguard the adjacent public resources if a major design or use change occurred.

We are concerned with protecting and maintaining the bighorn population which inhabits this area, if this is possible. The draft recognizes this encroachment threat to the species (pages 46-47). However, the draft should further define the lambing area and its relationship to the townsite, as well as providing a somewhat more direct evaluation on the probability of maintaining the lambing grounds and, in turn, the population. We believe there is a very strong possibility that the sheep population which currently utilizes this general area will be lost as a result of the proposed development.

The off-site water recreational impacts of the townsite's future population cannot reasonably be absorbed in the Parker strip area or immediately above Parker Dam. The strip is already out of control and the adjacent river uses are in direct conflict. Lake Havasu itself may support the increased water oriented recreational use, but it is logical to assume that the Parker area must also expect considerable impacts which will only add to the existing problems. This should be more fully explored in the draft, including management implications or options.



Response to Comments

by

U.S. Bureau of Sport Fisheries and Wildlife
(Fish and Wildlife Service)

- Comment: The access road to the proposed townsite will have adverse impacts on the Havasu National Wildlife Refuge. Controlled access will help mitigate adverse impacts.
- Response: The statement recognized that increased travel would have an adverse impact on wildlife using the refuge and adjacent lands.
- Comment: The Refuge Division favors the exchange.
- Response: The Refuge Division of BSF&W has been interested in acquiring the NE $\frac{1}{4}$ of Section 29, T. 11 N., R. 17 W. (160 acres), as an addition to the present refuge. See Appendix I. The proposal has been altered and does not include these lands.
- Comment: Should make a study to determine the actual water use and its effect on habitat on the refuge.
- Response: The reduced community size will use significantly less water and its potential impact on the refuge habitat will be reduced.
- Comment: Maps are inadequate.
- Response: Maps have been revised.
- Comment: Suggests revisions be made in wording for clarification on pages 20, 22, 24, and 28 of the draft statement.
- Response: Text in final statement has been revised where appropriate.
- Comments: Present road alignment is not suitable for upgrading without considerable modification.

U.S. Bureau of Sport Fisheries and Wildlife, cont'd

Response: The existing road was constructed by Yuma County in 1967. If the proposed townsite is developed, it is reasonable to expect that considerable modification of the existing vertical and horizontal alignments will be required to provide safe access for residents of the area. See letter from Arizona Highway Department dated December 17, 1973, in Appendix F.

Comment: Why is a sanitary landfill planned for BLM land rather than private land?

Response: The Recreation and Public Purposes Act of June 14, 1926, as amended, provides for public lands to be used for such purposes. However, under the modified proposal, private land can accommodate the sanitary landfill.

Comment: Questions concerning amount of water, effect of water use on riparian vegetation, increase in total dissolved solids, etc.

Response: See sections on "Water" in Parts II, III, IV and V.

Comment: List of avifauna was omitted from Appendix A. The spotted bat is threatened, and the Yuma cougar and Mexican pronghorn are undetermined or peripheral status subspecies.

Response: Appendix A has been revised to include avifauna and reflect the May, 1974, United States List of Endangered Fauna.

Comment: Should give further consideration and clarification to the Yuma lion (Yuma cougar) and the spotted bat.

Response: Although both species have been known to occur in the area, present information does not indicate any recent observation of the spotted bat or the Yuma lion. The March 1973 edition of "Threatened Wildlife of the United States" does not list the Yuma cougar. The May 1974 United States List of Endangered Fauna does not list either the spotted bat or the Yuma cougar.

U.S. Bureau of Sport Fisheries and Wildlife, cont'd

Comment: Statement should indicate what steps could be taken to protect adjacent public resources if the planned development did not proceed as presently envisioned by Arizona Ranch and Metals.

Response: Environmental considerations will be considered in making a decision on the proposed exchange. However, once the land passes into private ownership, under current law it will be the responsibility of State and local planning and zoning organizations to regulate and guide development.

Comment: Feels the bighorn sheep population in the vicinity of the proposed townsite would be lost as a result of the development.

Response: The text of the final statement has been revised to reflect this possibility.

Comment: The impacts of off-site water-oriented recreational uses should be more fully explored.

Response: The recreation impacts section of the final statement has been revised.



United States Department of the Interior

GEOLOGICAL SURVEY
WASHINGTON, D.C. 20242

OFFICE OF THE DIRECTOR

June 6, 1973

DES 73-18

| | |
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| ARIZONA STATE OFFICE BUREAU OF LAND MANAGEMENT | |
| JUN 6 '73 | |
| ASST. DIR. | |
| ASSOC. DIR. | |
| PLANNING | |
| RECORDS & COMM. | |
| TECH. SER. | |
| MANAGEMENT | |
| INSPECTION | |
| LEGAL COUNSEL | |
| CHIEF | |

Memorandum

To: State Director, Bureau of Land Management, Phoenix, Arizona

From: Director, Geological Survey

Subject: Review of draft environmental statement for Planet Townsite, Mohave County, Arizona

We have reviewed the subject draft environmental statement as you requested. Our comments are as follows:

Geology

Inasmuch as detailed data pertaining to the geology of the project site is unavailable, it is strongly suggested that an engineering-geology investigation of the site be made prior to any development. Such investigation, including drilling results, would serve to properly assess soil and geologic conditions and their relationship to suitable project implementation. Anticipated use of certain areas by off-road vehicles should also be considered with regard to soil and geologic conditions of the project area.

Hydrology

The estimate in the report of ground-water recharge, either present or potential, is excessive. Also the estimate of ground water in storage for use during a drought year appears to be much too large for a valley of this size.

Page 11 lists five sources of recharge which presumably is the basis for the estimate of recharge. Item 2, underflow from Bill Williams River,

cannot be counted as net recharge. The net recharge would be the inflow into the area of potential development minus the underflow out. Very likely, these two values would approximately balance each other out, leaving a net ground-water increment of near zero. Item 3, underflow from north and south, would be very small. Studies in similar areas of low precipitation indicate very little recharge potential. Item 4, recharge back to ground-water reservoir from irrigation use, doesn't constitute net recharge to the system. It represents only that part of the water withdrawn that is not lost. Item 5, recharge from precipitation on the valley, is zero.

The statement should fully consider the geologic-hydrologic situation either affecting or affected by the planned liquid and solid waste disposal systems.

Henry W. Condit
Acting Director

Response to Comments

by

Geological Survey

Comment: Engineering-geology investigations should be made prior to development.

Response: Prior to final approval of any development, compliance with State laws concerning water use and sewage disposal will be required by the State of Arizona (Appendix K).

Comment: The estimates of the quantity of water available are not correct.

Response: The text has been revised.



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

PHOENIX AREA OFFICE

P.O. Box 7007

Phoenix, Arizona 85011

IN REPLY REFER TO:

Real Prop. Mgmt.
300.1 - Colo. River

May 30, 1973

Memorandum

To: Arizona State Director, U.S. Bureau of Land Management

From: Area Director

Subject: Review of Draft Environmental Statement for the Proposed Planet Townsite, Mohave County, Arizona (DES 73/18)

This office has completed its review of the subject statement. In view of the qualifying remarks contained in the last paragraph on Page 2, it appears the statement is largely academic, and the "Planet Townsite" is merely one of a variety of developments that could occur as a result of the land exchange.

A more definite proposal is necessary in order for us to assess adequately the impact of the Federal action, which in this case is the land exchange, on the adjacent Colorado River Indian Reservation. An alternative would be to make the land exchange the subject of the impact statement and list the townsite as only one of several development possibilities.

[Signature]
Acting Asst Area Director

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Response to Comments

by

Bureau of Indian Affairs

Comment: Statement is academic since it is the exchange of Federal lands and not the development of a townsite that is the Federal action being analyzed. The development of a townsite is only one of a variety of possibilities for development of these lands once they pass from Federal ownership.

Response: This may very well be the case. However, Arizona Ranch and Metals Co. has publicly announced their intentions for a planned community development.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

STATE OFFICE

Federal Office Bldg., Room E-2841

2800 Cottage Way

Sacramento, California 95825

IN REPLY REFER TO:

1792(Int)
(C-911.4)

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JUN 1 1973

Memorandum

To: State Director, Arizona

From: State Director, California

Subject: Draft Environmental Statement on Planet Townsite
(DES 73-18)

Based upon our review of the draft statement on proposed land exchanges, which will lead to development of a new town, we have several observations. We hope these will prove useful in preparing your final statement. It appears that, considering the amount of information available at this time, this draft statement gives adequate consideration to the environmental impacts which might result from this development.

1. (page 6, second paragraph). Do mean daily July temperatures range between 106° and 108° F, or are these mean high temperatures?
2. (page 39, first paragraph). The discussion of "off-site, unauthorized utilization of many plants by horses" is not clear. Is trespass anticipated, or does the phrase refer to casual use accompanying equestrian activity?
3. (page 39, first paragraph). The last sentence in this paragraph would appear to be more appropriately considered under mitigating measures, than environmental impact.
4. (page 41, Water). Will the septic tanks proposed for the low-density development area have an adverse impact upon ground water quality? The second paragraph may include this impact, but you may wish to further emphasize it through separate discussion, even though it is touched upon in a later section (page 59).
5. (page 45, second paragraph). Is there any particular reason that sewage collection systems will not be installed together with the water distribution systems, or will water systems be furnished to the low-density development area?

Response to Comments

by

California State Director
Bureau of Land Management, USDI

Comment: Numbered items 1, 2, and 3 refer to matters that would clarify material in the text of the statement.

Response: The text has been revised.

Comment: Will septic tanks have an adverse effect on ground-water quality?

Response: The text has been revised to indicate compliance with standards to minimize adverse impacts.

Comment: Will water systems be furnished to low density development areas; and if so, why won't sewage lines also be installed?

Response: Water will be furnished to each lot in the development. The reason for not installing a sewage system throughout the low density areas is due to the cost of such a system and the land area for each homesite on the altered proposal is adequate for a septic tank system.

UNITED STATES GOVERNMENT

Memorandum

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
Nevada State Office
Room 3008 Federal Building
300 Booth Street
Reno, Nevada 89502

1792
(N-911.3)

DATE: MAY 8 1973

TO : State Director, Arizona

FROM : State Director, Nevada

SUBJECT: Planet Townsite Draft EIS (DES 73-18)

The following comments are offered on the subject draft EIS

1. Air - Page 15

Enlargement of this section may be helpful to the public to better understand the present situation. A copy of the approved air quality standards and statistics that are available about the present air quality readings could be inserted here. At least a reference to the relevant State and Federal laws could be made as was done on page 64 of the text of the draft EIS.

2. Soils - Page 40

Are there limitations on the soils for use of the land for sewage lagoons, dwellings, roads, and streets? If this information is available, or if there are no known limitations, a statement to this effect would clarify this for the public.

3. Wildlife - Page 48

Reference is made to the sentence in the third paragraph, "Bighorn sheep, deer, and feral burros might, on occasion, utilize ornamental shrubbery, flowers, and lawns." The question is raised as to whether these animals, and particularly bighorn sheep, will approach this close to a town which is expected to have a population of approximately 20,000 people.

General Comments

The illustrations used in the text of the draft EIS are effective and should be of interest to all who read this statement.

[Handwritten signature]

Response to Comments

by

Nevada State Director
Bureau of Land Management, USDI

Comment: Suggests additions or changes in text that would clarify the final EIS concerning air, soils, and wildlife.

Response: Sections in the text concerning air, soils, and wildlife have been revised.





United States Department of the Interior

BUREAU OF MINES
WASHINGTON, D.C. 20240

May 10, 1973

Memorandum

To: State Director, Bureau of Land Management, Arizona State Office

Through: ^{Deputy} Assistant Secretary--Energy and Minerals *Big MAY 23 1973*

From: Director, Bureau of Mines

Subject: Review of Planet Townsite (Draft) Environmental Statement (DES 7318)

We have reviewed the Planet Townsite draft Environmental Statement. The proposed action concerns the exchange of public lands with State and private interests and the development of a new town in Mohave County, Arizona. The draft statement avers that no minerals other than sand and gravel are known to be present on the townsite itself and that the potential for mining in the area is considered slight. There are some reserves of hematite and copper ore in the vicinity, but no iron has been produced from the property. Three million pounds of copper have been recovered, but the property has been inactive since 1917. Economic considerations appear to preclude any iron ore mining in the foreseeable future. The Bureau of Mines would like to emphasize, however, that rapidly changing technology may make these copper and iron reserves more attractive economically. Therefore, we recommend a thorough economic mineral survey before these reserves are made inaccessible by the development of a community nearby. As a minor point, the correct reference to "Reconnaissance of Iron Resources in Arizona" (p. 68 of draft statement) is Bureau of Mines Information Circular 8236, by C. M. Harrer in 1964.

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Elbert F. Olson
Director

Response to Comments

by

Bureau of Mines

Comment: Recommend a thorough economic mineral survey be made before reserves of iron and copper are made inaccessible. Rapidly changing technology may make these reserves economically attractive.

Response: The proposed townsite is located north of the Bill Williams River, whereas the known deposits of iron and copper ore are south of the river. On five of the seven parcels of BLM land proposed for exchange, the Government does not own the mineral estate. A field examination did not reveal any evidence of mineralization on the other two parcels.



United States Department of the Interior

BUREAU OF MINES

BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

Office of
Chief

Intermountain Field Operation Center

U. S. BUREAU OF MINES

MAY 21 '73

May 17, 1973

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Sir:

The Draft Environmental Statement for the Planet Townsite has been reviewed as requested.

West-central Arizona has not been as prolific a source of mineral output as some other areas in the State; however, it has its share of interesting base- and ferrous-metal prospects. One notable example is the New Planet iron and copper deposit located on the south bank of the Bill Williams River, about 1 mile south of the southwest corner of the planned development.

This New Planet mineral resource is discussed briefly on page 68 of the environmental report. The opening sentence, "The potential for mining is considered slight in the Planet Mine area," seems inappropriate. On a long-term basis remote, small, near-surface mineral deposits probably will be utilized as technical factors and economic conditions change. This should be noted. A conflict is not inferred, however. The single family lots, multiple family lots, and commercial area in the scheme of development would be located about 3 miles north of the iron-copper deposit. Mining of this iron-copper resource--whether in this century or the next--would not be constrained by the presence of the lots in the proposed land promotion.

We have no other comments.

Sincerely yours,

O. M. Bishop, Chief
Intermountain Field Operation Center

Response to Comments

by

Bureau of Mines Intermountain Field Operation Center

Comment: The copper and iron deposits south of the Bill Williams River will probably be utilized as technical factors and economic conditions change. Mining would not be constrained by the proposed land promotion.

Response: Text has been revised.



United States Department of the Interior

NATIONAL PARK SERVICE

WESTERN REGION

450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:

L7619
(WR)CW

May 23, 1973

Memorandum

To: State Director, Bureau of Land Management, Arizona State Office,
Arizona

From: Assistant Director, Cooperative Programs, Western Region

Subject: Draft environmental statement for the Proposed Planet Townsite,
Arizona (DES 73-18)

We have reviewed the subject draft environmental statement and submit the following comments:

There are no proposed or existing units of the National Park System within the project area, nor any sites eligible for registration as National Historic, Natural, or Environmental Education Landmarks.

The statement appears to have several inadequacies pursuant to Section 102 of the National Environmental Policy Act. First, the statement fails to provide substantive information regarding project impact upon archeological and historical resources, which neither allows an assessment of the project itself nor that of the alternatives described. The archeological survey conducted by Prescott College covered only the Federal lands proposed for exchange, omitting the state and private lands which should be considered within the total project area.

Secondly, the mitigating measures recommended in the archeological survey report are not fully discussed in the statement and there is no indication that these measures will be implemented. As the site density in the general project area is quite sparse, the sites that do exist assume a greater importance. The paucity of sites is relevant to archeological significance in the area settlement studies and should be examined more closely.

Finally, the statement should indicate direct or indirect impacts of the proposed action upon cultural values based solely on professional determination. In doing so, the statement should indicate consultation

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with the State Historic Preservation Officer regarding the effects of the project upon properties listed or in the process of nomination to the National Register of Historic Places.


Theodore R. Owings

Response to Comments

by

National Park Service

Comment: The statement should consider archeological and historical values on State and private land, as well as Federal land. Mitigating measures outlined in the archeological survey are not discussed.

Response: The archeological survey conducted by Prescott College is included in Appendix H. The text in this final statement has also been revised to reflect Federal requirements.

Comment: The statement should indicate impacts on cultural values based solely on professional determination and should indicate consultation with the State Historic Preservation Officer.

Response: Studies are presently under way to determine if the Swansea complex or the Planet ruins will qualify for nomination to the National Register. See letter dated December 18, 1973 from Arizona State Parks (Appendix F).



United States Department of the Interior

BUREAU OF OUTDOOR RECREATION
WASHINGTON, D.C. 20240

RECEIVED
MAY 18 1973
BUREAU OF LAND MANAGEMENT
ARIZONA STATE OFFICE

P.C.

IN REPLY REFER TO:

MAY 15 1973

Memorandum

To: Director, Bureau of Land Management
Attention: State Director, Arizona State Office

From: Director

Subject: Review of draft environmental impact statement for
the proposed Planet townsite, Mohave County, Arizona
(DES 73/18)

The subject report attempts to set out the environmental impact of a proposed subdivision development based upon extremely limited information furnished by the proposed developer, Arizona Ranch and Metals Company. This is virtually an impossible task since the company apparently is under no obligation either to follow the plans proposed or to retain the land that could be acquired from BLM. Conceding the limitations this places on the value of any Environmental Impact Statement, we will proceed to review the proposal.

As we understand it, the Arizona Ranch and Metals Company proposes to develop a 11,980 acre townsite, with a population of 20,000 people. The development as proposed requires the use of certain BLM lands which would be exchanged for State and company lands. The exchange would consolidate individual BLM, State and private land holdings and improve the ownership pattern for all three parties. It is pointed out that if the exchange is not consummated the development could still proceed using existing company-owned lands. The company has drawn up only preliminary plans. According to the draft EIS, detailed plans will not be started until and if title is received to the required BLM lands. It is indicated that the proposed development will provide primarily for low density single family dwellings on one to five acre sites, although 400 acres would have 10,000 square foot lots. At that density and using the company estimate of 3.2 people per family, the 400-acre section will provide housing for over 5000 people,

25 percent of the total proposed population. The planned development map also refers to multiple family lots; however, there is only an oblique text reference made to these lots and no reference made to their proposed density. No development would take place in the Bill Williams River flood plain nor in the wash bottoms. It is unclear whether this is company policy or a legal requirement to which the company must conform. It is also not indicated whether the flood plain in which there will be no development is at the 25,50 or 100 year level.

Minimum land clearing is planned. The company will use deed restrictions to control architectural design and prevent further subdivision. Planning will emphasize equestrian facilities, and also include a golf course, tennis courts, a 30 to 40 acre lake and a area for off-road vehicle use. No manufacturing industry is planned. Except for transmission lines electric utilities will be underground. Roads will be paved within the development. The primary access road from Lake Havasu will be paved; however, it is unclear whether the company or the county will do the paving. Secondary sewage treatment will be provided for more densely populated areas. In low density sections, landowners would develop their own septic tank systems. A sanitary landfill is planned on public land. Domestic water will be pumped from the Bill Williams River flood plain to storage tanks at the northern limits of development. The company expects to sell 80 percent of the area within five years through interstate land sales.

The above outline essentially covers what the company has planned. In reading through the project description, it is evident that not much time or money commitment has been made to date. Based on this sparse information and looking at the physical environment of project, some attempt was made by the BLM State Office in Phoenix to estimate physical impact. However, there was no real attempt to estimate the social impact of the project. Our review of this draft will concentrate on the social and recreation impact of the project.

To assess the social impact it is essential to get information on company policy. Nothing of this nature has been provided. Some of the information needed is as follows:

- 1.) History of the company's land development experience.
- 2.) Estimated company infrastructure investment prior to any lot sale.

- 3.) A development schedule indicating the phasing of utility and recreational development.
- 4.) Anticipated lot sale rate and build out rate.
(The information given on this is contradictory. Also, the Lake Havasu City development rates are given as being comparable to rates that might be expected at the Planet townsite. There is no justification for this comparison, since these two projects have virtually nothing in common. In fact, any use of the Lake Havasu project to assess potential social or physical impact or to describe the potential development of the Planet townsite, as used in this EIS, should be seriously questioned.)
- 5.) Arrangements made by the company for home construction, if any; estimated construction costs.
- 6.) The Company's expected remaining interest in the townsite after all lots are sold.
- 7.) The price of lots with and without utilities; the price of raw land per acre; and estimated resale potential of the lots.
- 8.) Maintenance fees for greenbelt and recreational areas.
- 9.) Quality of recreation facilities provided. Is the proposed equestrian facility, for example, an already existing stable at the Planet Ranch? What is its' condition? Is there any improvement contemplated for it?

In addition to setting out company policies, it is also vital to include information which would indicate the local government's capability to deal with a large development project. Very often the expertise of the developer exceeds that of the county. If this is the case, the county must depend on the developer to assess the impact of his own project. This following information should be included:

- 1.) The size and experience of the Mohave County planning department.
- 2.) The status of subdivision and flood plain regulation in the county.
- 3.) The number of county-wide subdivided project lots that have not yet been built upon.
- 4.) The distance of public facilities such as hospitals and schools from the project.
(A development such as proposed often has a high proportion of older people who may require emergency medical care.)
- 5.) County estimated service costs and tax yield from the project. (Very often speculative subdivisions such as the Planet townsite cost the county more in providing schools, police protection and other services than they yield in tax revenue. Taxes are often hard to collect since purchasers may have permanent residences outside the State.)
- 6.) Although there is some information about roads leading to the Planet Ranch from the Parker Strip area, there is no information about a bridge crossing over the Bill Williams River from the Yuma County road to the ranch road. If there is a bridge can it be used all year, or are there periods when the Planet townsite would be without access to essential urban services?
- 7.) Does the county have the capability to assess the adequacy of the quality and quantity of the water to be required for the Planet development?

In addition we believe some information should be included on the State of Arizona's legal requirements for subdivision land sales.

At this point, we would like to indicate that the company claim, cited in the draft EIS, that this project could proceed without BLM lands may be erroneous. Much of the presently owned company lands lies within

the Bill Williams River flood plain. If there are state laws restricting development on flood plains, then the company could not use these lands for that purpose. Perhaps the only other areas that could receive intensive development, such as proposed for BLM administered sections 16 and 17, would be company-owned sections 20 and 21. These sections may have unstated physical limitations which would make development infeasible. These possible limitations should be investigated. Even if no limitations are found BLM should not accede to the land exchange simply because the company indicates it will develop anyway.

More information is also needed on the State's role in this land exchange. In the proposal description and on Map 3, it is indicated that the State also wishes to exchange land holdings with BLM. Is this proposed newly acquired land then to be sold by the State to the Arizona Ranch and Metals Company? If so, we think it relevant to know whether this constitutes tacit approval of the proposed Planet townsite by the State.

From the standpoint of recreation, there may be adverse impacts on future residents that the EIS overlooks or misinterprets. Based upon what was quoted in the draft EIS about visitors to Lake Havasu City and Parker, and lot purchasers in that area, it can be expected that purchasers of lots at the Planet townsite generally will be older people with no dependents. Even those middle-aged people buying lots anticipate their major use will occur during the retirement years when they presumably become permanent residents. According to surveys and studies carried out by BOR, interest in active recreation decreases with age. Interest in passive recreation also declines, but at a much less rapid rate. The following data taken from a 1972 survey of recreation participation illustrates the point.

Horseback Riding

| Age | Percent Participating | Days/Participant |
|-------|-----------------------|------------------|
| 12-17 | 15.1 | 8.4 |
| 18-24 | 9.7 | 6.2 |
| 25-44 | 3.8 | 2.0 |
| 45-64 | 1.4 | 4.5 |
| 65- | .2 | 1.0 |

Tennis

| Age | Percent Participating | Days/Participant |
|-------|-----------------------|------------------|
| 12-17 | 11.5 | 13.5 |
| 18-24 | 10.3 | 7.6 |
| 25-44 | 4.6 | 8.9 |
| 45-64 | 1.6 | 6.8 |
| 65- | .5 | 2.0 |

Sightseeing

| | | |
|-------|------|-----|
| 12-17 | 38.9 | 5.7 |
| 18-24 | 38.3 | 5.9 |
| 25-44 | 40.2 | 6.3 |
| 45-64 | 38.6 | 6.3 |
| 65- | 25.6 | 5.4 |

Based on this information, we believe the desirability of tennis and equestrian facilities for the townsites to fill recreation needs is questionable. The table taken from the ORRC study (p. 51 of the draft EIS) indicating participation without any age breakdown is both outdated and misleading. It should not be used in the final EIS and no conclusions should be drawn from it.

It is interesting to point out that if this draft EIS correctly evaluates the effect of increased domestic water use on riparian vegetation (page 39) sightseeing in the Bill Williams riparian area may no longer be an enjoyable recreation activity. In effect, the development of this project may eliminate a recreation activity enjoyable to older people and substitute those which are not.

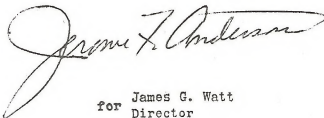
The statement also does not clearly indicate the purpose for the 35-acre lake except that it will not be used for boating. Will swimming use also be excluded? The statement should also indicate what lands in the vicinity of the townsites can be used for off-road vehicles. If most of the BLM administered lands can be used for that purpose, then the utility of a separate off-road vehicle area at the Planet townsites is open to question. Additionally, according to Map 4 the golf course will be over 2 miles away from the town center via paved road. The equestrian facilities will also be about two miles away from the town center via paved road. This should be stated in the narrative. Map 4 also indicates that a section of the project will include multiple

family lots. These apparently are in addition to the 10,000 square foot lots indicated on the map and those other one to five acre parcels which we assume will cover the remain space area within the project boundaries. If the total proposed population of these multiple family lots exceeds 5000, then the company errs in claiming that the Planet townsite is primarily a low density development. Narrative information on these lots and projected densities should be included. Additionally, information should be included that would explain why the 10,000 square foot lots and the multiple family lot sections can be more intensively developed than the other part of the development. In other words, if most of the land within the project area cannot withstand intensive development, why can these sections be intensively developed?

We would like to make our final comments on the project mitigations. Apparently the only mitigating measures to be taken are compliance with the law, deed restrictions, and the developer's statement that as little damage as possible will be done to the environment.

Meeting legal requirements should not be considered a mitigating measure since the developer could be prosecuted for not meeting them. Deed restrictions, while valuable, limit lot purchasers only, and require no monetary commitment from the developer. Finally, the company's word that an environmentally sound job will be done is simply not enough. Engineering, design, and construction information should be included that would indicate a more serious commitment to a goal of mitigating the project impact.

We appreciate the opportunity to comment.

A handwritten signature in dark ink, appearing to read "Jerome F. Anderson". The signature is fluid and cursive, with a large, sweeping initial "J".

for James G. Watt
Director

Response to Comments

by

Bureau of Outdoor Recreation, USDI

Comment: Not clear as to whether development would be excluded from the flood plain of a 25, 50, or 100-year storm area.

Response: No structures would be placed in the flood plain of a 100-year flood. Effective August 8, 1973, a State statute (A.R.S. 45-2341 et seq.) on floodplain management requires incorporated cities and towns and counties to delineate floodplain areas where development is ongoing or imminent in accordance with criteria developed and adopted by the Arizona Water Commission for the purpose of establishing what constitutes 50 and 100-year floods for the State of Arizona. Acting as a floodplain board counties and municipalities must adopt floodplain regulations pertaining to the subdivision of and construction upon land which may divert, retard or obstruct flood water. The floodplain boards must also establish minimum flood protection elevations and flood damage prevention requirements for existing structures and facilities vulnerable to flood damage. All dwellings built within a floodplain must have their minimum floor elevations above the high water line of a 100-year flood. No structures are to be built within a designated floodplain area unless 75 percent of the area is already platted and approved and utilized as of August 8, 1973, or unless a floodplain regulation has been adopted or a developer is given a special permit.

Bureau of Outdoor Recreation, cont'd

Comment: Not clear as to who will pave the road.

Response: See Arizona Ranch and Metals Co. letter, Appendix F.
Roads that are to be dedicated to the county must be built by the developer according to county specifications. Once built and dedicated, they are thereafter maintained by the county; but if they are part of a road improvement district, the county is reimbursed for such maintenance by the district; otherwise maintenance comes out of county funds to which the State contributes a substantial portion from its highway user tax.

Comment: Draft did not attempt to estimate the social impact of the project and suggests that to analyze the social impact, certain information would be needed (9 specific items).

Response: 1. History of company's land development experience.
See numbered paragraph 14 on pages 7 and 8 of AR&M letter in Appendix F.

2 to 9. The information requested concerning details for the actual development is not available at this time.

Comment: Information should be included which would indicate the local government's capability to deal with a large development project.

Response: See Item 12, page 7, of AR&M letter, Appendix F.

Bureau of Outdoor Recreation, cont'd

Comment: In order to assess the local government's capability for handling this type of a proposal, seven items of information would be required:

1. Size and experience of Mohave County Planning Department.

Response: Mohave County has a 3-member elected Board of Supervisors. The county also has a Planning and Zoning Commission that advises the Board on planning and zoning matters. They are presently operating under a general county planning ordinance developed in the mid 1960's.

Comment: 2. Status of subdivision and floodplain regulation in the county.

Response: (See item 1 above).

Comment: 3. Number of lots in the county that have not yet been built upon.

Response: Appendix G contains a study by the Arizona Department of Economic Planning and Development concerning private subdivisions in Arizona. This study covered 46 subdivisions presently in Mohave County and indicated they had a capacity for 544,800 people at this time. No information is available as to what percentage of the lots are developed at this time.

Comment: 4. Distance of existing schools and hospitals from the proposed development.

Response: The nearest facilities are at Parker and Lake Havasu City. Each would be approximately 25 miles away over existing roads.

Bureau of Outdoor Recreation, cont'd

Comment: 5. Estimated service cost to county versus expected revenue from taxes.

Response: This information is not available at this time.

Comment: 6. Is there a bridge across the Bill Williams River near the proposed townsite?

Response: Some sort of all weather crossing, bridge or culverts, will have to be built.

Comment: 7. Can county assess the quantity and quality of water required by the proposed development?

Response: See discussion of water in text.

Comment: Information should be included on State legal requirements for land sales.

Response: The State of Arizona has a Real Estate Code (Arizona Revised Statutes (ARS) Title 32, Chapter 20) which is administered by the State Real Estate Department. The Code licenses, regulates, and supervises the activities of brokers and salespersons.

Before offering subdivided lands (four or more lots) for sale the owner, agent, or subdivider is required to complete subdivision questionnaire (RE form, sub-1).

The Real Estate Commissioner is required to examine all subdivisions offered for sale and make public his findings.

Subdivided land cannot be sold without provisions for legal access to the land.

ARS Section 9-1141 contains procedures for the subdivision of private lands into a townsite.

Counties obtain their authority for planning and zoning under ARS Section 11-801.

Bureau of Outdoor Recreation, cont'd

Comment: Suggests that perhaps AR&M could not develop the lands they presently own because of legal or physical restrictions, and that BLM should not agree to the land exchange simply because the company indicates it will develop anyway.

Response: The statement points out that without the proposed exchange, a city like the one originally proposed could not be developed. However, nothing prevents the company from selling lands to individuals who would then build residences without the benefit of an overall development plan. The modified 500 homesite proposed development is not contingent upon the exchange. Approximately four-fifths of the homesites are on private land and could be developed without a land exchange.

Comment: Need more information as to the State's role in the proposed exchange. Does the State approve of the exchange?

Response: See letters from various State agencies (Appendix F).

Comment: The draft overlooks or misinterprets possible adverse impacts from the recreation standpoint.

Response: The sections on Recreation have been revised to reflect the information suggested by Bureau of Outdoor Recreation. The final statement analyzes the expected impact of recreation activities on the environment. It does not attempt to explain what types of recreation facilities should be provided for future residents if a town is built.

Comment: A number of questions concerning use of the proposed lake, area for off-road vehicles, distance from town to the golf course, and equestrian facilities, high density versus low density development, etc., are raised.

Response: The revised proposal of AR&M Co. no longer includes a lake development (consult map 3 for distances).

The statement attempts to analyze the impacts of what AR&M indicate they plan to do. The entire proposal depends on consummation of a land exchange. As a result, it is noted that plans for development are quite general at this time. If the land exchange is made, then plans containing the detail could be required by local planning and zoning bodies prior to approving the subdivision.

Bureau of Outdoor Recreation, cont'd

Comment: Meeting legal requirements should not be considered a mitigating measure, and the company's word that it will do an environmentally sound job is not good enough.

Response: Most laws pertaining to developments like the one proposed were enacted to assure that environmental damages were minimized. In the context of this statement they are discussed as measures that would mitigate environmental damages expected to occur with such a development.



United States Department of the Interior

BUREAU OF RECLAMATION
WASHINGTON, D.C. 20240

IN REPLY
REFER TO: 430
120.1

JUL 6 1973

Mr. Joe T. Fallini
Arizona State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

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| ARIZONA STATE OFFICE BU. LAND MANAGEMENT | |
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Dear Mr. Fallini:

We have completed our review of the Planet Townsite Draft Environmental Statement (DES 73-18, dated March 29, 1973) which was recently distributed by your office. Our comments are as follows:

We understand that land exchanges involving 9,646 acres of public land are proposed to facilitate a private urban development for 7,000 families in Mohave County, Arizona. The proposed development (Planet Townsite) is expected to have a population of 20,560 by the year 2024. Facilities normally associated with a community of this size would be required. The closest existing major development is Lake Havasu City with a current population of 8,000 and a projected population of 60,000. Additional development of areas near Planet Townsite can be expected. Presumably, the general area will become more urban as time passes.

We would like to see additional information concerning plans for public utilities and services in Chapter I, "Description of Proposal." Reviewers' understanding of the proposal and its potential environmental impacts would be enhanced by inclusion of more detailed and specific information on plans for electrical service; roads and other transportation facilities; sites for schools, churches, and other public buildings; water requirements, treatment, and distribution plans; collection, treatment, and disposal of sewage and solid wastes; and flash flood protection.

The last paragraph on page 2 in chapter I is not clear. The third sentence begins by indicating that a list of items describing the proposed development plan is to follow. However, no list is presented. The disclaimers of guarantee that follow indicate that the actual development may not conform to the proposal described in the environmental statement, thereby invalidating the analyses of environmental impacts that are presented in subsequent chapters.



The legend of map 3, "Land Exchange Information, Planet Townsite," contains a symbol for "Federal lands desired by the State of Arizona" However, the map does not show any tracts bearing this symbol. We suggest that the locations of the proposed low-density housing developments (1- to 5-acre sites), mentioned on page 3, be shown on map 4, "Planned Development," and that better maps showing the existing and future road system be included.

It may be desirable to include some reference to Public Law 90-448 (Interstate Land Sales Full Disclosure Act) in connection with plans for interstate land sales by the developer mentioned on page 5.

In Chapter II, "Description of Environment," the sections on "Vegetation" and "Wildlife" do not indicate whether any rare or endangered species other than the Yuma Clapper Rail are found in the area. We suggest addition of lists of indigenous birds and fishes to the list of animal species in appendix A.

It is suggested that the Lower Colorado Basin Research Laboratory at the Arizona State University, Tempe, Arizona, be requested to review and furnish comments on the environmental statement. Its field investigations of the Bill Williams River above the Alamo Dam have revealed the presence of two previously undescribed species of fish. It has not yet made a field study of the river below Alamo Dam, including that portion of the river that flows through the proposed townsite.

The sections on "Recreation" and "Archeology" in chapter II mention such historical features as the Old Planet Townsite Ruins, Swansea Historic Complex, and various archeological sites. Are any of these features listed in the National Register of Historic Places?

We note that Chapter III, "The Environmental Impact of the Proposed Action," includes no discussion of impacts that would be related to providing electrical energy for the Planet Townsite development. Electrical energy during the initial 5-year development would be obtained from the Arizona Public Service Company substation at Planet Ranch (see page 4). This substation is tapped to the Bureau of Reclamation's 69,000-volt Parker-Bagdad Transmission Line, which is shown crossing the planned development area on map 4. When the demand exceeds the existing capacity, additional capacity must be provided by constructing additional transmission facilities or by upgrading existing facilities (see page 4). Either will result in short-term degradation of the environment due to construction activities. If

additional transmission lines are routed into the townsite area over new corridors, the effect will be long-lasting; new lines would probably consist of permanent overhead construction. The attendant access roads for maintenance will be used by the general public, thereby increasing off-road damage to the desert (see page 70).

A similar situation now exists at Lake Havasu City where studies indicate that by 1976 the Citizens Utilities Company transmission facilities, which supply power to Lake Havasu City from the Bureau of Reclamation's Parker Dam, will no longer be adequate. Additional electrical energy must be brought into the Lake Havasu area through new facilities.

It is inevitable that additional electrical facilities would have to be provided. The new transmission facilities would probably be overhead construction due to economic considerations. They should be located where the visual impact can be minimized. Distribution facilities planned for the Planet Townsite would be underground (see page 4). Planning for distribution facilities in the adjacent areas should also provide for underground installation so that the overall visual impact in the general area is minimized.

The Bureau of Reclamation Parker-Bagdad 69 kV. transmission line right-of-way traversing secs. 9, 17, and 18, T. 11 N., R. 16 W. (see map 4 and page 17) lies within the proposed development. The right-of-way is 100 feet wide through the area being considered, and possible utilization of this area was not mentioned. It should be pointed out that permission must be granted for use of the transmission line easement. Permission will not be granted for the erection of any structure, drilling of wells, or the parking of house trailers. It should be pointed out that the Government's perpetual right of ingress and egress over the easement to operate, maintain, or reconstruct the transmission line is not to be jeopardized.

Landscaping on the transmission line right-of-way will be permitted provided that trees or shrubs used will not exceed a height of approximately 15 feet at maturity. Planting should not be made closer than 10 feet to any pole to assure an adequate work area around the structure for routine maintenance or emergency repairs. It is recommended that future lot owners be made aware of existing restrictions pertaining to construction within the Parker-Davis transmission line easement.

With reference to the discussion of "Water" in chapter III, we would like to emphasize that further depletions by consumptive use on the Bill Williams River upstream from the Havasu Intake Channel and Havasu Pumping Plant would have an adverse effect upon the quality of water available in the Colorado River for diversion by the Central Arizona Project.

Additionally, the exchange of lands could adversely affect long-range water resource planning, as contemplated under title II of the Colorado River Basin Project Act (Public Law 90-537) for augmentation of the flows of the Colorado River. Potential alternative plans were presented as plans A, B, and D in the January 1968 reconnaissance report, Augmentation of the Colorado River by Desalting of Sea Water.

The section on "Wildlife" in chapter III suggests that loss of habitat resulting from the development would result only in "displacement" of wildlife (first full paragraph, page 46). We think that absolute reduction of wildlife populations is more probable. It would be useful to indicate in this section the types and areas of wildlife habitat that would be eliminated or otherwise adversely affected by the proposed development. Estimates of the resulting reductions of wildlife populations are also desirable, especially for species of special interest such as the desert bighorn sheep, the Mexican pronghorn antelope, and the Yuma Clapper Rail.

It is noted that construction and use of roads in the vicinity of the Havasu National Wildlife Refuge would have significant adverse effects on wildlife numbers. Some description of effects of road construction as intended under sec. 4(f) of the Department of Transportation Act of 1966 (Public Law 89-670) would be useful in assessing these impacts.

Flash flood hazards should also be described in the statement. We note that several washes cross the proposed townsites but there is little specific information on how storm water would be diverted.

In Chapter IV, "Mitigating Measures . . .," it is stated under "Water" that "Water lost from the Colorado system would not be significant because the quantity is relatively small and because the water from the Bill Williams River is not part of the Colorado River adjudicated waters." We disagree with the view that the depletion would not be significant. The accumulation of "small" uses has contributed to the well-known water supply and quality problems in the Lower Colorado River Basin. We consider any reduction in quantity or quality of

Colorado River system waters to be significant, no matter how small. The fact that the source of water for the proposed development would be the Bill Williams River does not mitigate the impacts on quantity and quality of mainstream flows.

We appreciate the opportunity to review the draft environmental statement for the proposed Planet Townsite.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "G. H. Starna".

Commissioner

Response to Comments

by

Bureau of Reclamation

Comment: Would like additional information on specific plans for such things as utilities, schools, roads, sewage plants, etc.

Response: Arizona Ranch and Metals Co. has prepared preliminary plans that are quite general. Subsequent to the issuance of the draft statement they revised their proposal.

Following is a listing of some nearby facilities. Parker has two libraries, one of which is also a museum, and Lake Havasu City has one library. There is a rest home in Blythe and one in Kingman. The school system in the area consists of one primary school, one elementary school, and two high schools in Parker, and one elementary school each in Poston, Bouse, and Parker Dam. In addition, Poston has a US Government Project Head Start Program and a University of Arizona Agricultural Extension Service. There are two elementary schools in Lake Havasu City, in addition to a junior high school and a senior high school. Lake Havasu City also has a community college, a school for gifted children, and courses at a University of Arizona Extension Service are available.

Bureau of Reclamation, cont'd

Comment: Last paragraph, page 2 of the draft not clear.

Response: Text has been revised.

Comment: Maps not clear.

Response: Maps have been revised.

Comment: Mention Public Law 90-448.

Response: Text revised.

Comment: Any rare or endangered wildlife? Add list of birds.

Response: Appendix A of text revised

Comment: Have Arizona State University review statement. Two species of undescribed fish have been found in Bill Williams River above Planet Ranch.

Response: See Appendix E for list of distribution of draft statement. Dr. Minckley of ASU advised BLM by phone on 8/2/73 that two different, previously undescribed suckers had been collected from waters above the Planet Ranch. Although no studies have been conducted below the ranch, it is reasonable to expect the occurrence of endemic species of fish in the lower reaches as well.

Dr. Minckley pointed out that very little information has been gathered on the flora and fauna of this area and he felt studies were needed.

Bureau of Reclamation, cont'd

Comment: Are certain features listed in the National Register of Historic Places?

Response: At the present time there are no sites listed in the National Register of Historic Places and none have been officially nominated. Studies are underway to determine if any sites in the area would qualify for nomination under EO 11593.

Comment: Additional electrical facilities will be needed, and their construction will result in adverse environmental impacts, e.g., off-road vehicle access.

Response: Powerline construction and associated roads will result in adverse impacts when additional power is provided. The text has been revised to include this item..

Comment: The right-of-way for the existing 69 kv transmission line contains restrictions on development that would be allowed on the right-of-way.

Response: AR&M is aware of these restrictions and would plan details of the development accordingly.

Comment: Water use by the planned townsite would have an adverse impact on quality of water available for C.A.P. and could adversely affect long-range water resource planning.

Response: The statement recognizes the possibility of lowering water quality (pages 42 and 43). The establishment of a new town or any other project requiring water consumption will, of

Bureau of Reclamation, cont'd

course, have to be considered in the preparation of water resource plans. The revised plan reduces the consumptive use of water. The water from the Bill Williams River is not part of the Colorado River adjudicated waters.

Comment: The development would result in absolute reduction of wildlife population.

Response: Assuming that the wildlife habitat within the surrounding area, as well as the area to be developed, is fully occupied, then any reduction in habitat would result in a corresponding reduction of wildlife dependent on such habitat. The text has been revised.

Comment: Estimates of resulting reductions in populations of antelope, bighorn sheep and the Yuma clapper rail would be helpful.

Response: Very little information is available concerning estimates of numbers of wildlife in this part of Arizona. The bighorn sheep that use the surrounding area probably do not exceed 50 in number. The proposed development, as well as other development like the Central Arizona Project, will in all probability result in the eventual elimination of these animals. Antelope populations that will be directly or indirectly affected by the proposed development are estimated at 50 or less. Like the bighorn, the proposed town development is only one of the many factors that could result in the complete elimination of this species.

The habitat of the Yuma clapper rail is primarily associated with thick growths of tules or cattails that grow on areas

Bureau of Reclamation, cont'd

inundated by water. It is not anticipated that the habitat for this species will be reduced as a result of the proposed town development unless the development results in changes in water flows necessary for maintenance of riparian vegetation downstream from Planet townsite.

The biggest threat to survival of this endangered species appears to be loss of habitat from channelization of the lower Colorado River and resulting losses of marshes and sloughs. It is estimated that there are 200 to 500 of these birds along the lower Colorado River. Impacts from the townsite would, however, be cumulative and could exasperate an already marginal situation.

Comment: Description of the effects of road construction would be helpful.

Response: Road construction activities and the associated noise, dust, visual scarring will have certain short-term impacts on the surrounding environment. The long-term impacts of increased travel associated with the proposed townsite are felt to be more important in the overall context of this statement.

Comment: Flash flood hazards should be mentioned.

Response: The possibility of flooding is discussed in the statement.

Comment: Any reduction of quality or quantity of Colorado River water is significant.

Response: See revised text and Appendix C for additional discussion of water.

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION-REGION ~~NUMBER~~ Nine
450 Golden Gate Avenue, Box 36096, San Francisco, Calif. 94102

ARIZONA
CALIFORNIA
HAWAII
NEVADA

May 14, 1973



IN REPLY REFER TO:
930-00.3

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Sir:

We have reviewed the Draft Environmental Impact Statement for the proposed Planet Townsite, EIS No. INT DES 73-18, and offer the following comments for your consideration:

1. A discussion of the long-range impacts to the highway facilities in the vicinity of the townsite should be included in the Final Statement.
2. As mentioned in the EIS, wildlife and livestock may create traffic hazards, especially where wildlife trails cross the roadways. Any proposed mitigating actions to reduce this potential highway safety hazard should also be discussed in the Final EIS.

We appreciate this opportunity to review the subject Draft EIS.

Sincerely yours,

R. V. WHITE
Deputy Regional Administrator

By 
E. M. WOOD
Director of Environment & Design

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Response to Comments

by

U.S. Department of Transportation

Comment: Should include a discussion of long range impacts on the highway facilities.

Response: State Highway 95 runs from Parker north to Lake Havasu City and would be expected to receive a majority of the traffic from the proposed community. On that portion of the highway from Parker north to Osborn Wash, the actual average daily trips of motor vehicles in 1970 was 800, and 2800 such trips are projected for 1990. On that portion of the highway from the Bill Williams River north to Lake Havasu City, the actual number of average daily trips for 1971 was 4,100, and 10,500 such trips are projected for 1991. The existing highway from Parker to Lake Havasu City has a practical capacity of 1,500 vehicles per hour per lane and a maximum capacity of 2,000 vehicles per hour per lane at an approximate speed of 35 miles per hour. The prescribed design norms for the traffic capacity of such a highway requires a 28-foot highway for traffic from zero to 300 vehicles per hour; a 34-foot highway for traffic of 300 to 1,000 vehicles per hour; and a 40-foot highway for traffic from 1,000 to 5,000 vehicles per hour. The present highway from Parker to the Bill Williams River averages 28 feet including 3 feet shoulders, and from the Bill Williams River to Lake

Department of Transportation, cont'd

Havasu City the highway varies from 30 feet to 50 feet including 3 foot shoulders. The number of vehicle trips per day from the proposed 500 homesite community when fully developed is estimated to be 360. See letter dated December 17, 1973, from the State Highway Department (Appendix F).

Comment: Proposed mitigating measures to reduce potential highway safety hazards should be discussed in the final EIS.

Response: Increased traffic will result in more traffic accidents. Mitigating measures such as reduced speed limits and better highway design may be proposed. Detailed proposals have not been made at this time.



Arizona State Senate

Phoenix, Arizona

October 4, 1973

COMMITTEES
TRANSPORTATION, CHAIRMAN
NATURAL RESOURCES AND ENVIRONMENT
APPROPRIATIONS ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

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Mr. Joe T. Fallini
Arizona State Director
U. S. Bureau of Land Management
3022 Federal Building
Phoenix, AZ 85025

*C; DIRECTOR
DM Yuma
DM Phoenix*

Re: Planet Townsite SAI 73-80-0024

Dear Joe:

The purpose of this letter is to express my deep concern over the apparent lack of agreement among state agencies in their response to the proposed federal, state and private exchange of land involving the Planet Ranch, owned by Arizona Ranch and Metals Company.

Correct me if I am wrong, but it is my understanding that the State Land Department is agreeable to an exchange, the Water Commission has expressed some reservation which it probably would set aside to be settled at a later time, and that OEPAD (formerly DEPAD) is adamant in wanting a number of questions resolved before proceeding with land exchanges.

I am particularly concerned with the negative memorandum dated June 11, 1973, from Robert G. Worden of DEPAD and with the subsequent memorandum of September 25, 1973, from David M. Hamernick of OEPAD with his 14 questions, one of which I quote, as follows:

"14. The last paragraph on page 79 is important. It correctly shows the necessity for decisions of this nature to be placed within the framework of a Statewide land use plan. This is true not only for a substitution, but also for the proposal itself. If a substitution of this nature should be made within the framework of a Statewide land use plan, so should the original proposal for the land exchange."

Both Mr. Worden and Mr. Hamernick apparently feel that no exchanges should be made until they could be fitted into a "Statewide land use plan". May I point out that there is no

statewide land use plan, and that there is no assurance as to when there will be such a plan. When responsible people present a legitimate proposal, they cannot be held in abeyance forever. That catchy expression "land use planning", which rolls off the tongue like a sweet morsel, is a high-sounding phrase, but carries with it at every governmental level some deep implications that are going to provide a political battleground for years to come.

In my opinion the issues are much simpler than Mr. Worden or Mr. Hamernick would make them, and several of them are not really relevant to the proposed land exchange. To me the question at hand is simply this: Is it in the best interest of the state and the federal government to cooperate with private landowners in consolidation of property, and will the ensuing development be better than that which will take place without the exchanges?

The answer is equally simple. As I have reviewed the proposals, it seems obvious to me that all interests would be benefited by the exchange, when you consider the alternatives for a development of the riparian areas along the Bill Williams River done on a piecemeal basis by a variety of developers without the benefit of an overall plan. This will probably be the course taken if an exchange is not effected soon. The Planet people have spent a lot of time and money on this project and cannot be faulted for their impatience over the turn of events.

Obviously, the very legitimate questions posed by Mr. Worden and Mr. Hamernick have already been raised and will need to be resolved as proposed development of the property takes place. In my opinion, however, it certainly is not necessary to resolve them before a land exchange is entered into. In fact, if such is required, I am sure that the exchange will never materialize and that the alternate development will be disastrous to the area.

It is paradoxical that, with all our talk and public concern for proper planning, when an organization comes forward with a reasonably good plan, there are so many official and self-appointed critics around that the result is to shoot down the plan before it even gets off the ground, resulting in development without planning.

I can assure you I am getting "cold feet" about placing the state in the position of doing much planning, if this is an example (as I expect it is) of the bureaucratic bungling that will accompany development proposals. It may well be that the best results will come from the continuation of private interests

Mr. Joe T. Fallini
October 4, 1973

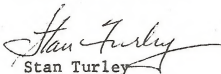
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putting their own money into plans approved by the "most local" level of government, and keep the state out of planning as much as possible.

I urge you to move forward as rapidly as possible in working out an exchange that is to the benefit of all parties concerned. The attendant problems will still be there and can be resolved as time goes on.

My apologies for going to such great lengths to make my point, but I feel rather strongly about this matter.

Sincerely yours,


Stan Turley

ST:ijs

cc: Governor Jack Williams
President William C. Jacquin, Senate
Speaker Stan Akers, House of Representatives
Senator Jim Mack, Chairman, Natural Resources Committee
Representative Bill Lewis, Chairman, Natural Resources Committee
Mr. Andy Bettwy, State Land Commissioner
Mr. Wes Steiner, Executive Director, Water Commission
Mr. Robert G. Worden, Executive Director, OEPAD
Mr. Walter Smith, Executive Vice President, Arizona Ranch and Metals Company
Mr. Frank C. Brophy, Jr., Ryley, Carlock & Ralston

Response to Comments

by

Hon. Stan Turley, Arizona State Senate

See following letter from Arizona State Director, BLM, dated
October 10, 1973



United States Department of the Interior

IN REPLY REFER TO

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(910)

BUREAU OF LAND MANAGEMENT

State Office
3022 Federal Building
Phoenix, Arizona 85025

October 10, 1973

Hon. Stan Turley
Arizona State Senate
Phoenix, Arizona 85007

Dear Mr. Turley:

I thank you for your letter of October 4, commenting on the proposed Federal-State-private exchange of lands involved in the Planet Ranch.

This exchange proposal was initiated several years ago by the Arizona Ranch and Metals Company who desire to block up their private land holdings in the Planet Ranch area for development of a new town. The State Land Commission has filed an exchange application for Federal lands that lie on the border of the proposed townsite in order to obtain potential high value lands for the benefit of the State School Trust fund. The Mohave County Board of Supervisors supported the proposed exchanges and new town development.

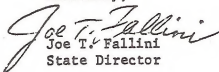
The proposed land exchanges would have certain benefits for the Federal Government. The Arizona Ranch and Metals Company owns several parcels of land along the Bill Williams River Valley which have important wildlife values. One of these tracts would make a valuable addition to the Lake Havasu National Wildlife Refuge. The Arizona Ranch and Metals Company can proceed with development of their private lands whether or not an exchange is made. There are about 3900 acres of Federal lands intermingled and surrounded by State and private lands which would be isolated if urban development proceeds without the exchange. We therefore are willing to consider the proposal to consolidate the private, State, and Federal lands in the vicinity.

Our draft environmental statement was prepared to analyze the environmental impact of the proposal in accordance with the National Environmental Policy Act. It is not the intent or responsibility of the Bureau of Land Management to determine whether a townsite should be developed at this location. This decision rests with local governmental planning and zoning authorities.

We have received a number of comments from interested agencies, organizations, and individuals. We plan to proceed with the preparation of the final environmental statement. After completion of the statement, a decision concerning the proposed exchanges will be made.

We appreciate receiving your comments, and they will be considered prior to reaching a decision on the proposed exchanges.

Sincerely,


Joe T. Fallini
State Director



JACK WILLIAMS
GOVERNOR

OFFICE OF THE GOVERNOR
STATE HOUSE
PHOENIX, ARIZONA 85007

IN REPLY
REFER TO:

October 22, 1973

The Honorable Stan Turley
Arizona State Senator
2650 E. Southern Avenue
Mesa, Arizona 85204

Dear Stan:

I have read your letter of October 4, 1973 to Mr. Joe Fallini concerning the Planet Townsite. I am responding to your letter because it appears that a number of misconceptions exist regarding the comment and review procedures that were followed, and the issues that were raised. The draft environmental impact statement regarding the Planet Ranch Proposal was prepared by the Bureau of Land Management in accordance with the National Environmental Policy Act of 1969. Mr. Fallini issued the draft environmental impact statement in order to elicit comment from agencies of state government and other interested parties. He now has these comments and is preparing a final statement. When the final environmental statement is ready, he will send copies to the state agencies and others who have commented or are interested. Also, the statement will be sent to Washington for staffing at the Department of Interior and the Environmental Protection Agency.

The important point in this context is that the environmental impact statement is not a decision-making document. We have discussed this point with Mr. Fallini, and he is equally distressed that a number of people have the idea that the comment and review process of the environmental impact statement has been viewed as a decision-making process with respect to the land exchange. Actually, the land exchange decision will be made at a later date after the final environmental impact statement is completed. Incidentally, the decision for the land exchange will be made by Mr. Joe Fallini of the Arizona Office of BLM if the total appraisal value of the land involved is less than \$250,000. If the appraisal is greater than that amount, the decision will be made in Washington.

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The Honorable Stan Turley
October 22, 1973

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The National Environmental Policy Act of 1969, in conjunction with the Intergovernmental Cooperation Act of 1968 as implemented by the Office of Management and Budget Circular A-95, provide for a specified state role with regard to such statements. The state is required to review and comment on such documents through a procedure established by the Governor. In Arizona, I have established the State Programming and Coordinating Committee for Federal Programs to assist in this review. I have designated the Office of Economic Planning and Development as the State Clearinghouse with staff responsibilities for the procedure. I regard the Clearinghouse activities as very important in our efforts to determine the impact of federal actions on our state.

The established procedures were followed in the review of the environmental impact statement regarding the Planet Ranch proposal. The Office of Economic Planning and Development which is part of my office had two major responsibilities. First, as the State Clearinghouse it was responsible for causing the review of the draft environmental impact statement by appropriate state agencies. Secondly, as the planning staff of my office it had a responsibility to comment on the proposal as did the other state agencies. Both of these responsibilities were fulfilled. The results of the review were transmitted to Mr. Fallini on June 11. Ordinarily this action would have ended the state's involvement. However, at the request of the Arizona Ranch and Metals Company a meeting of interested parties was held to discuss the draft environmental impact statement and to provide further comment by the state agencies that had reviewed the draft statement. The review revealed that the State Land Department favored the land exchange. The Arizona Power Authority indicated no objection to the statement. Four state agencies had no comment. Questions and concerns were raised by the Water Commission, the Arizona Outdoor Recreation Coordinating Commission, the Department of Health, the Arizona Game and Fish Department, and the Office of Economic Planning and Development. In addition, and apart from the Clearinghouse Procedure, the cognizant Regional Council of Governments as well as the League of Arizona Cities and Towns had negative comments with respect to the draft environmental statement. Local non-governmental agencies such as the Arizona Conservation Council and the Arizona Wildlife Federation also indicated some objections to the draft environmental statement.

I can assure you that my Office of Economic Planning and Development

The Honorable Stan Turley

October 22, 1973

-3-

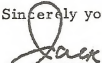
is not adamantly against the draft environmental statement or the proposed land exchange. This office and other agencies commenting on the draft environmental impact statement were attempting to be helpful and to raise those questions and issues involving the Arizona environment. BLM will take as much of the material as may be germane and useful in developing its final impact statement. Here again, I must mention that the decision regarding the land exchange will be made only after the final impact statement is completed.

I believe we should remember that: There was no plan presented with the draft environmental impact statement; those officials who did raise questions and comment did so with respect to the draft environmental impact statement; none of the officials who commented on the draft statement are self appointed critics. They were conducting an environmental review in accordance with established Clearinghouse Procedures and on the basis of their various areas of responsibility. BLM should find these various comments of some usefulness when it puts together the final environmental impact statement.

In summary, five state agencies, the cognizant Regional Council of Governments, the League of Arizona Cities and Towns, and two local non-governmental agencies raised questions and had critical comments in regard to the draft environmental statement affecting their areas of concern in the State of Arizona. However, it appears that some of their comments relate to the decision-making process of the land exchange itself and may have gone beyond what is required during the staffing of an environmental impact statement. On this point, I am informing Mr. Fallini that any comments that he received completely outside the parameters of the environmental impact statement are not appropriate at this time. When the final impact statement is available and we are at a decision point, there will be adequate opportunity to address the question of the land exchange in writing and through public hearings.

I thank you for the effort that you put forth in writing about this subject because it is important. If there needs to be further discussion on this subject or if misunderstandings continue, please let me know.

Sincerely yours,


Jack Williams

JW:sg

The Honorable Stan Turley

October 22, 1973

-4-

cc: President William C. Jacquin, Senate
Speaker Stan Akers, House of Representatives
Senator Jim Mack, Chairman, Natural Resources Committee
Representative Bill Lewis, Chairman, Natural Resources Committee
Mr. Andrew Bettwy, State Land Commissioner
Mr. Wesley Steiner, Executive Director, Arizona Water Commission
Mr. Robert G. Worden, Executive Director, OEPAD
Mr. Walter Smith, Executive Vice-President, Arizona Ranch and
Metals Company
Mr. Frank C. Brophy, Jr., Ryley, Carlock and Ralston
✓ * Mr. Joe Fallini, Phoenix Office, Bureau of Land Management

*(Thank you for your assistance to Frank Sackton in clarifying this issue. As I have noted in this letter, any comments that you received on your draft environmental statement outside the parameters of the environmental questions should be held in abeyance until the decision-making process.)

JW

Response to Comments

by

Hon. Jack Williams, Governor of Arizona

This letter was directed to the Hon. Stan Turley, Arizona State Senator, and is included here for additional information.

DEPARTMENT OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

June 11, 1973

Mr. Joe T. Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Re: Planet Townsite - Draft Environmental Statement
State Application Identifier: 73-80-0024

| | |
|------------------------|-------|
| ARIZONA STATE OFFICE | |
| B.L.M. LAND MANAGEMENT | |
| JUN 14 '73 | |
| SD | _____ |
| ASSOC. SD | _____ |
| PCS | _____ |
| RESOURCES | _____ |
| TECH SER | _____ |
| MGMT SER | _____ |
| PJB. AFF | _____ |
| CF | _____ |
| ACTION | |
| IND. O. | |
| SEE ME | |

Dear Mr. Fallini:

The Arizona State Clearinghouse has received and reviewed the Planet Townsite - Draft Environmental Statement. This review has generated several responses, copies of which are attached. As you will note, many of the review agencies have raised questions of a substantial nature regarding this proposal which should be considered before completing this land exchange.

Please contact me if the Clearinghouse can be of further assistance in resolving these issues.

Sincerely yours,

Dennis A. Davis, Executive Secretary
for Federal Programs

DAD:cr
encl

✓
DEPARTMENT OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

Date: April 16, 1973

TO: Mr. John Dickinson
Department of Economic Security
Post Office Box 6123
Phoenix, Arizona 85007

FROM: Clearinghouse Staff Contact: Mrs. Constance LaMonica

SUBJECT: Environmental Statement Review

Applicant: Bureau of Land Management

Project Title: Planet Townsite - Draft Environmental
Statement (DEIS 75 18)

State Application Identifier: 73-83-0024

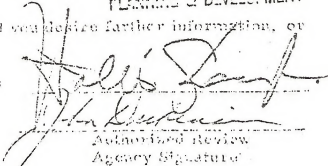
A copy of a Draft Environmental Statement is attached for your review and comment in accordance with requirements of OMB Circular A-95. Please review the proposal as it affects the plans and programs of your agency and register your response below. Also note a staff contact within your agency in case further consultation is required. Please return this completed form within 30 days (15) days of your receipt of this request.

- ☒ No comment on the above project.
☐ Proposal is supported as written.
☐ Comments are attached.

RECEIVED
APR 20 1973STATE CLEARINGHOUSE
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact:


Authorized Review
Agency Signature

C O P Y

ARIZONA GAME AND FISH DEPARTMENT

June 4, 1973

Mr. Joe Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Mr. Fallini:

Our Department has reviewed the Draft Environmental Statement for the proposed Planet Townsite* in Mohave County, Arizona. In view of the potential impact that the development will have on wildlife habitat in the area, we wish to express reservations on the desirability of the proposed land exchange.

Several species of wildlife already having a precarious existence could possibly be faced with an even more desperate situation with the development. The Yuma clapper rail, an endangered bird species, could have its numbers reduced further if the streamside vegetation along the Bill Williams River is reduced or modified. Projected human disturbance to desert bighorn sheep would have an undesirable effect on this unique ungulate. Additional land development in this portion of southern Mohave County would, in all probability, result in the elimination of the local population of Mexican pronghorn antelope. The proposed townsite also harbors good numbers of Gambel's quail, whitewing doves, mourning doves, and a limited population of desert mule deer. These species would not be "displaced," as anticipated in the statement summary, but would, in reality, be removed.

* A Draft Environmental Statement, Planet Townsite, April 1973.

Mr. Joe Fallisi

- 2 -

June 4, 1973

Wetlands received through the exchange would be modified substantially through water consumption associated with the intensive development. In addition, a substantial portion of the wildlife habitat preservation is contingent upon use of the land as designated by the private land owner. Should the subdivision be successful, it is unreasonable to believe the wildlife areas would remain undeveloped.

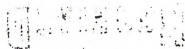
We feel the public interest is best served by the no project alternative and the Bureau of Land Management should not exchange lands which will encourage development to the detriment of the adjacent public-owned land and resources.

Sincerely,

Robert A. Jantzen, Director

RAJ:lw

bcc: Department of Economic Planning
and Development



RECEIVED
JUN 11 1973
12:00 PM

Response to Comments

by

The Arizona Game and Fish Department

Comment: Points out concern for wildlife species already having a precarious existence. Also that certain species would be removed rather than displaced.

Response: Text has been revised.

Comment: Wetlands to be acquired by the Federal Government would be modified because of water use by the proposed town.

Response: This possibility has been noted and text revised. See Appendix J.

Comment: If subdivision is successful, it is unreasonable to expect wildlife areas would remain undeveloped.

Response: The statement recognizes the continuing impact on wildlife using lands adjacent to the development.

Comment: BLM should not proceed with exchange.

Response: A decision on the proposed exchange will not be made until after completion of this statement.

ARIZONA



DEPARTMENT OF ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

Date: April 16, 1973

TO: Dr. Louis C. Kossuth, Commissioner
Department of Health
1624 West Adams Street, Third Floor
Phoenix, Arizona 85007

RECEIVED

APR 17 1973

STATE DEPT. OF HEALTH
OFC. OF COMMISSIONER

FROM: Clearinghouse Staff Contact: Mrs. Constance LaMonica

SUBJECT: Environmental Statement Review

Applicant: Bureau of Land Management

Project Title: Planet Townsite - Draft Environmental
Statement (DES 73 18)

State Application Identifier: 73-80-0024



A copy of a Draft Environmental Statement is attached for your review and comment in accordance with requirements of OMB Circular A-95. Please review the proposal as it affects the plans and programs of your agency and register your response below. Also note a staff contact within your agency in case further consultation is required. Please return this completed form within fifteen (15) days of your receipt of this request.

- ☐ No comment on the above project.
- ☐ Proposal is supported as written.
- ☒ Comments are attached.

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact

Economic Planning and
Development
Bureau of Land
Management
Phoenix, Arizona
85007

James W. Scanlan

Authorized Review
Agency Signature

Planet Townsite - Draft Environmental Statement
73-80-0024

COMMENTS

1. The proposed Planet Townsite will be composed of mainly large acreage lots (over one acre) that are not required to be furnished with water. A 'dry lot' is undesirable for sanitation purposes, and many 'dry lots' would probably be sold to unsuspecting people since 80 percent of the land would be for interstate sales.
2. The expected water quality (page 12) may be hard to find. The recommended total dissolved solids content of water is 250 ppm as compared to the expected quality of 271-369 ppm. Reused water for irrigation contains a high dissolved solids content and would probably increase the dissolved solids content of the ground water. The optimum fluoride concentration for drinking water in the area is 0.7 ppm and the mandatory rejection limit for drinking water is 1.4 ppm. The fluoride content of well water for towns close to the proposed townsite is 4-5 ppm (for Parker, Bouse and Havasu Springs Resort).

Response to Comments

by

Arizona State Department of Health

Comment: Indicates that "dry lots" are undesirable for sanitation purposes and expresses concern that 80 percent of the land would be sold to unsuspecting people through interstate sales.

Response: Interstate sales are regulated by Public Law 90-448. ASR&M indicates that all lots will be provided with water.

Comment: Presents data concerning water quality and suggests that the expected water quality may be hard to find.

Response: See Appendix J and further discussion in text.



Arizona Power Authority

1810 WEST ADAMS STREET
PHOENIX, ARIZONA

MAIL ADDRESS
P. O. BOX 6694
PHOENIX, ARIZONA
ZONE NO. 85005

TELEPHONE
(602) 271-4263

May 2, 1973

Mrs. Constance LaMonica
Clearinghouse
3003 North Central Avenue Suite 1704
Phoenix, Arizona 85012

Subject: Planet Townsite - Draft
Environmental Statement (DES 72 18)
73-80-0024

Dear Mrs. LaMonica:

By letter of April 16, 1973, you transmitted for review the above environmental statement. Included in this statement is a proposal by the Bureau of Land Management to exchange certain lands with the Arizona Ranch and Metals Company in the vicinity of Parker Dam, Arizona.

I would like to point out that certain land parcels of the proposed exchange are included in a three year preliminary permit granted to the Arizona Power Authority on December 6, 1972, by the Federal Power Commission for the study of a proposed pumped storage project at Lake Havasu.

The Authority does not, however, object to the land exchanges as delineated in the above environmental statement. The land parcels of the proposed exchange that are included in the Authority's F.P.C. permit are to be transferred from the Arizona Ranch and Metals Company to the Bureau of Land Management. It is our understanding that the Authority's F.P.C. permit once filed, will reserve B.L.M. lands from entry as long as the permit remains in effect.

Sincerely yours,

ARIZONA POWER AUTHORITY

L. S. Ormsby by *met*
L. S. Ormsby
Acting Administrator

RECEIVED
MAY 4 1973

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

LSO:mh

Response to Comments

by

Arizona Power Authority

Comments: Arizona Power Authority has a preliminary permit for the study of a proposed pumped storage project. The permit covers certain private lands to be conveyed to the Federal Government in the proposed exchange.

Response: The preliminary permit granted to Arizona Power Authority by the Federal Power Commission was surrendered during December 1974.

GEORGE E. LEONARD
CHAIRMAN
JOHN S. HOOPES
VICE-CHAIRMAN
WESLEY E. STEINER
EXECUTIVE DIRECTOR
AND
STATE WATER ENGINEER



Arizona Water Commission

222 NORTH CENTRAL AVENUE, SUITE 800

Phoenix, Arizona 85004

TELEPHONE (602) 258-7561

MEMBERS
PETER BIANCO
LINTON CLARIDGE
DAVID R. GIPE
DOUGLAS J. WALL
WILLIAM H. WHEELER
EXOFFICIO MEMBERS
ANDREW L. BETTWY
MARSHALL HUMPHREY

May 2, 1973

RECEIVED

MAY 9 1973

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT.

Mrs. Constance LaMonica
Department of Economic Planning
and Development
3003 North Central, Suite 1704
Phoenix, Arizona 85012

Dear Mrs. LaMonica:

As requested we have reviewed the Draft Environmental Statement for the Planet Townsite (73-80-0024).

We find the draft less than satisfactory in several areas. Of principal concern is the indefinite nature of the proposed action.

First, the three way land exchange is not well described. For instance, on map 3 the federal lands desired by the state do not appear on the map, although they are indicated in the legend. The legend indicates 9646.37 acres of federal land are to be exchanged into private ownership, but only about 5,000 acres are delineated on the map. Worse yet, the numbers on the map and those in the text do not seem to agree.

Second, the draft indicates that the lands traded to the state will be sold for development at a later date, but it does not include this subsequent action in the analysis of the impact of the proposed exchanges. This exchange is of significance as it would increase the development by about one third, and the sale seems as definite as the development of the remainder of the exchanged land.

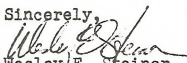
Third, the draft raises serious questions of adequacy with the remark that "...there is no guarantee that this is the kind of development that would occur...". This is our most serious concern—in the face of this comment the only thing about the proposed action of which one can be certain is that 10,000 to 20,000 acres of ranch and desert lands will be urbanized. Thus we recommend recasting the

Mrs. Constance LaMonica
Page 2
May 2, 1973

statement to discuss the extreme possibilities—the worst, and the best. As the subject draft now describes something near the best it is inadequate in describing the impact of the exchange.

Of lesser importance is the fact that the subject draft provides inadequate description of the water resources and the flood hazards of the area. Appending the referenced report by Samuel F. Turner may suffice as quantitation of the water supply, but then again it may not. Considering that development of the area, once exchanged, may be precluded by state and local review of the development's water supply adequacy, it would be wisest to extensively explore the water supplies vis a vis possible uses before consummating the proposed federal action. Local flood zoning may also alter the developer's plans and should therefore be considered in more detail before effecting the exchange.

Sincerely,


Wesley E. Steiner
Executive Director

Response to Comments

by

Arizona Water Commission

Comments: Draft and maps not adequate.

Response: Maps have been revised.

Comments: Impact of eventually developing State lands adjacent to private lands not analyzed.

Response: The State of Arizona is proposing to retain certain lands for later development after the proposed town development is complete. Since there are so many uncertainties involved in the proposed development, all that can be done at this time is to acknowledge that if the town becomes bigger, the impacts will be greater.

Comment: Description of water resources and flood hazards inadequate. After the exchange, development may be precluded by State and local review of water supply adequacy or local flood zoning.

Response: Studies made by Turner in 1962 and Manera & Associates, Inc. in 1971 indicate that there is sufficient water to support the proposed 7,000 homesite development. The consumptive use of water will be reduced significantly with the 500 homesite development. No structural development is planned in flood plains.



DEPARTMENT OF ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

TO: Mr. J. Fred Talley, Commissioner
Real Estate Department
2801 North 15th Avenue
Phoenix, Arizona 85007

Date: April 16, 1973
State Real Estate Dept.

APR 17 1973

CHECKED BY _____ DATE _____
☐ OK TO LICENSE
☐ WRITE LETTER RE:

FROM: Clearinghouse Staff Contact: Mrs. Constance LaMonica

SUBJECT: Environmental Statement Review

Applicant: Bureau of Land Management

Project Title: Planet Townsite - Draft Environmental
Statement (DES 73-18)

State Application Identifier: 73-80-0024

A copy of a Draft Environmental Statement is attached for your review and comment in accordance with requirements of OMB Circular A-95. Please review the proposal as it affects the plans and programs of your agency and register your response below. Also note a staff contact within your agency in case further consultation is required. Please return this completed form within fifteen (15) days of your receipt of this request.

- ☐ No comment on the above project.
- ☐ Proposal is supported as written.
- ☒ Comments ~~xxxxxxxxxx~~. Very Interesting.

RECEIVED
APR 13 1973

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact

F. E. Pettycrew

Economic Security
General Fish
Real Estate
Health
Planning
Public
Transportation
Water

Dept.
Dept.
Dept.
Dept.
Dept.
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Dept.

J. Fred Talley
Authorized Review
Agency Signature
Commissioner

Jack Williams
Governor

B

Commissioners
Dennis McCarthy
Chairman
Gene C. Reid
Vice Chairman
Robert A. Jantzen
Secretary

Arizona Outdoor Recreation Coordinating Commission



4433 N. 19th Avenue, Suite 203
Phoenix, Arizona 85015
(602) 271-5013

Staff
Roland H. Sharer
Liaison Officer
&
Project Director
Michael H. Peterson
Planning Officer
Lyle A. Bair
Recreation Planning
Coordinator

May 29, 1973

RECEIVED

JUN 4 1973

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Mrs. Constance LaMonica
State Clearinghouse
3003 North Central Avenue, Suite 1704
Phoenix, Arizona 85012

Dear Connie:

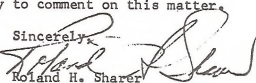
My apologies for taking so long to review and return comments on the Planet Townsite - Draft Environmental Statement (DES 73 18). I have been trying to gather enough information so that I may respond in a credible manner. It appears that the environmental impact statement is a very technically complete document and our comments are not addressed to the technicalities of the document itself, but to the land exchange and the townsite.

It seems to me that establishing a new city in this area of the State may not be justifiable or desirable at this point in time. It has been only recently that the Department of Economic Planning and Development has completed a study on remote subdivisions in Arizona. This study pointed out some rather severe land use problems and conflicts that have come about as a result of this subdivision overdevelopment. The report indicates that there are existing developments which could very easily accommodate five million people, on paper at least. I have real concern that the Planet Townsite proposal could very realistically compound this already critical problem in Arizona.

Another area of concern is that the legislature has just recently established an office of Land Use Planning in the Governor's Office. It would seem that this being the case, review of this proposed townsite should be studied by the Land Use Planning Office immediately. No decisions should be made by anyone at any level of government prior to the State Land Use Planning Office being involved in this project. The costs of services alone to be provided by such a development have not begun to be determined. Therefore, we can not support this development at this time nor support the proposed land exchanges until the State Land Use Planning Office has become involved.

Thank you for the opportunity to comment on this matter.

Sincerely,


Roland H. Sharer
State Liaison Officer

Response to Comments

by

Arizona Outdoor Recreation Coordinating Commission

Comment: Comments directed toward need for city. Cites DEPAD study and expresses concern that the proposed development would compound an already critical problem in Arizona.

Response: The study mentioned is contained in Appendix G.

Comment: Points out that State Legislature recently established an office and no decision should be made until this office has studied the proposal.

Response: Copies of the draft EIS were sent to the State Clearinghouse, but no response was received from the Office of Land Use Planning.

A commission has been established to recommend legislation and guidelines for State land use planning. To date no comprehensive land use planning legislation has been enacted.

Comment: Costs of services needed for the development have not yet been determined.

Response: Detailed plans have not been developed for the proposed townsite. Subsequent to the issuance of the draft statement Arizona Ranch and Metals Co. revised their proposal and reduced the size of the proposed townsite.



DEPARTMENT OF ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

Date: April 16, 1973

TO: Department of Economic Planning
and Development
3003 North Central Avenue, Suite 1704
Phoenix, Arizona 85012

FROM: Clearinghouse Staff Contact: Mrs. Constance LaMonica

SUBJECT: Environmental Statement Review

Applicant: Bureau of Land Management

Project Title: Planet Townsite - Draft Environmental
Statement (DES 73 18)

State Application Identifier: 73-80-0024

A copy of a Draft Environmental Statement is attached for your review and comment in accordance with requirements of OMB Circular A-95. Please review the proposal as it affects the plans and programs of your agency and register your response below. Also note a staff contact within your agency in case further consultation is required. Please return this completed form within fifteen (15) days of your receipt of this request.

☐ No comment on the above project.

☐ Proposal is supported as written.

☒ Comments are attached.

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact

Economic Planning Dept
Agency FAX
Address
Phone
Fax
E-mail

Authorized Review
Agency Signature

DEPARTMENT OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

MEMORANDUM

TO: Mrs. Constance LaMonica
Arizona State Clearinghouse

FROM: Robert G. Worden
Department of Economic Planning and Development *RJW*

SUBJECT: Planet Townsite - Draft Environmental Statement
State Application Identifier: 73-80-0024

DATE: June 11, 1973

The staff of the Department of Economic Planning and Development has reviewed the Planet Townsite Draft Environmental Statement.

The statement does not appear adequate for the following reasons:

1. It fails to demonstrate that sufficient habitat is available or will remain to accommodate important displaced wildlife species.
2. It indicates that water quality will deteriorate but does not mention the adverse effect this would have upon downstream water users and the natural environment itself.
3. It discusses what are termed "mitigating measures" but, with the exception of underground electric distribution lines, it is evident that the visual scene will be changed dramatically.
4. The basic proposal indicates that the land would be subdivided. However, detailed maps descriptive of how the land development would be controlled, how services would be provided, how open space areas would be preserved, etc. are not provided. Further, the statement implies that the development would be a satellite community to Lake Havasu City. Yet, there does not appear to be any guarantee of adequate road access to the city. The environmental statement is based primarily upon assumptions and not guarantees.

Mrs. Constance LaMonica
Memorandum
June 11, 1973
Page 2

5. A fundamental question also exists as to whether it is desirable to encourage a new community in this region of Arizona. There is a real concern whether the benefits to the citizens of Arizona would be sufficient to offset what appears to be extensive environmental degradation. In addition, it seems unadvisable for government to encourage land subdividing and occupancy in a county with a large amount of acreage already subdivided and experiencing a very slow absorption rate. Generally speaking, government services can be provided more efficiently at lower cost when the people locate in proximity to urban clusters and service centers. This proposal tends to encourage population dispersal.

It is the opinion of this Department that the Planet Ranch proposal needs to be placed in the context of a state land use plan. In May of 1973, the Arizona State Legislature authorized preparation of such a land use plan and implementation of this directive has just begun. It would seem advisable that the proposed action be deferred until such a plan is underway. In addition, the State Land Department is conducting a Colorado River Land Study, the result of which will undoubtedly have impact on this area.

In the interim, it might be advisable for the proposal to be examined using the techniques developed by the Arizona Trade-Off Model (ATOM). This might assist in preparing a more complete environmental evaluation.

State and Federal Governments can, of course, be of assistance in assembling land packages for many purposes which are beneficial to all parties. However, in the case of this proposal, the framework for such an analysis is lacking.

Therefore, we request that the Bureau of Land Management delay consummating this proposal until it can be more carefully evaluated in relation to other state concerns.

Response to Comments

by

Arizona Department of Economic Planning and Development

Comment: Statement is not adequate because:

1. Does not prove sufficient habitat is available to accommodate displaced wildlife.

Response: The statement has been revised to indicate that wildlife will not be displaced but lost. Revised text and comments on letter from Bureau of Reclamation (Appendix F).

Comment: 2. Statement indicates water quality will deteriorate but does not point out effects this will have on downstream water users.

Response: The lack of knowledge concerning impacts is noted in the revised text.

Comment: 3. Visual scene will be changed.

Response: The proposed development would alter present use, and changes in the visual scene would occur.

Comment: 4. Statement is based on assumptions, not guarantees.

Response: See letter from Ryley, Carlock & Ralston, Attorneys for Arizona Ranch and Metals Co. (Appendix F).

Comment: 5. Question as to benefits of proposal to citizens of Arizona to offset environmental degradation. Cost is less if people locate close to urban centers.

Arizona Department of Economic Planning and Development , cont'd

Response: This statement does not attempt to compare benefits to Arizona against the impacts of the proposal on the environment of the area. The purpose of this statement is to provide the decision-maker (State Director of BLM in Arizona) with the facts as to what impacts on the environment can be anticipated if he selects the proposed course of action or one of the alternatives.

At this time the State of Arizona does not have a statewide land use plan and no recognized position as to whether the State supports population dispersion or concentration around existing population centers.

BLM is not attempting to determine whether development should be concentrated or dispersed, but rather is attempting to analyze what the environmental impacts of the proposed development would be on the Planet Ranch area. The fact that there are presently at least 182 large scale subdivisions in Arizona (Appendix G) may or may not indicate that the State and counties prefer this type of development.

It is recognized that most of these subdivisions are not designed to provide the same type of development as envisioned by AR&M.

Arizona Department of Economic Planning and Development, cont'd

Comments: Should place in context of State land use plan. Defer action until such plan is underway. State Land Department is conducting a "Colorado River Land Study."

Response: The State of Arizona does not have a land use plan at this time. The primary purpose of the referenced study is to determine what, if any, lands along the Colorado River should be transferred to State ownership.

Comments: Suggest use of Arizona Trade-Off Model (ATOM) to assist in preparation of environmental evaluation.

Response: The ATOM is now being tested on a similar type proposal. Any beneficial results of this study will be applied to the Planet Townsite proposal.

Comments: State and Federal governments can assist in assembling land packages for beneficial purposes, but framework for such an analysis is lacking. Request delay in consummating proposed exchange.

Response: Normally the Federal Government does not take the initiative in blocking public lands for disposal to aid private development. The Federal Government will assist State and local governments' proposals provided such proposals do not conflict with Federal management goals.



DEPARTMENT OF ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

Date: April 16, 1973

TO: Mr. Justin Herman, Director
Department of Highways
206 South 17th Avenue
Phoenix, Arizona 85007

FROM: Clearinghouse Staff Contact: Mrs. Constance LaMonica

SUBJECT: Environmental Statement Review

Applicant: Bureau of Land Management

Project Title: Planet Townsite - Draft Environmental
Statement (DES 73-18)

State Application Identifier: 73-80-0024

A copy of a Draft Environmental Statement is attached for your review and comment in accordance with requirements of OMB Circular A-95. Please review the proposal as it affects the plans and programs of your agency and register your response below. Also note a staff contact within your agency in case further consultation is required. Please return this completed form within fifteen (15) days of your receipt of this request.

- ☒ No comment on the above project.
☐ Proposal is supported as written.
☐ Comments are attached.

RECEIVED
APR 20 1973

STATE CLEARINGHOUSE
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact:

Economic Planning 4444
General Fund 16183
Highways 6010
Bureau of Land Management 271-5371
Department of Highways 271-5371
Department of Economic Planning & Development 271-5371

Justin Herman
By: J. N. Broderson
Authorized Review
Agency Signature

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

Date: April 16, 1973

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- ☒ No comment on the above project.
- ☐ Proposal is supported as written.
- ☐ Comments are attached.

RECEIVED
APR 25 1973
RESEARCH

RESEARCH & PLANNING
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Please contact the Clearinghouse should you desire further information, or need additional time for review.

Review Agency Staff Contact

Authorized Review
Agency Signature



JACK WILLIAMS
GOVERNOR

Arizona
State Land Department

1624 WEST ADAMS
PHOENIX, ARIZONA 85007
602 - 271-4634



ANDREW L. BETTWEY
STATE LAND COMMISSIONER

April 19, 1973

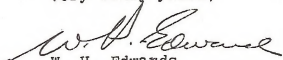
Arizona Department of Economic
Planning and Development
3003 N. Central Av. Suite 1704
Phoenix, Arizona 85012

Dear Sir:

Re: State Application Identifier: 73-80-0024

The State Land Department favors the proposed Federal-State private exchanges to make Planet Townsite possible. The exchanges will permit sound grouping of respective holdings, provide for better management and produce a greater return to more Arizona residents.

Very truly yours,


W. H. Edwards
Administrative Assistant
Contract Audit & Review

WHE:mb

RECEIVED

APR 20 1973

STATE CLEARINGHOUSE
DEPARTMENT OF ECONOMIC
PLANNING & DEVELOPMENT

Response to Comments

by

Arizona State Land Department

Comment: Favors exchange.

Response: This is a second letter from the Arizona State Land Department. See comments on letter dated April 23, 1973, Appendix F.

ARIZONA

OFFICE
OF THE
GOVERNOR



OFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

October 1, 1973

Mr. Joe T. Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Re: Planet Townsite
SAI 73-80-0024

Dear Mr. Fallini:

Enclosed for your consideration is further comment by the
Office of Economic Planning and Development relative to the
above environmental statement.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Dennis A. Davis".

Dennis A. Davis, Executive
Secretary for Federal Programs
DAD:CL:lf
encl

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|----------------------|--|
| ARIZONA STATE OFFICE | |
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OFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

MEMORANDUM

TO: Arizona State Clearinghouse

FROM: David M. Hamernick, OEPAD *DH*

DATE: September 25, 1973

SUBJECT: Planet Townsite-Draft Environmental Statement #73-80-0024

The Office of Economic Planning and Development has already submitted a statement on the proposed land exchange. After our meeting last week, I felt it might be appropriate to add a few comments on the environmental impact statement. Perhaps the comments and questions could be answered in the final statement.

1. The statement should describe the number of acres to be transferred from the Bureau of Land Management to the Arizona Ranch and Metals Co., (AR&M) and the number of acres to be transferred from Arizona Ranch and Metals to BLM. A map showing the exchange between BLM and AR&M should be provided. Further, the map should show all the land to be controlled in fee by AR&M if the exchange is completed.
2. The statement should describe the BLM land being leased to AR&M before and after the exchange. What are the restrictions on the leases? Will the land traded from AR&M to BLM be leased again to AR&M?
3. The statement should describe any improvements on the lands to be exchanged, and whether or not the water rights will transfer from AR&M to BLM.
4. How many acres of riparian vegetation would BLM receive in the exchange, and how many acres of desert vegetation or dry wash would they receive? How many acres of riparian vegetation would BLM transfer to AR&M in the exchange, and how many acres of desert vegetation and dry wash would they transfer?
5. The statement should describe the impact on the riparian vegetation lands owned by BLM in drought years with the projected water withdrawal for the proposed community and the irrigated agricultural lands owned by AR&M.

6. The statement should show the flood plain as delineated in the Corps of Engineers study, and describe whether the roads and other improvements are located in the flood plain.
7. The statement should describe plans to protect the wildlife species both on and off-site.
8. What obligation does the public (BLM) have to provide a sanitary land fill site? Why isn't it part of the exchange?
9. I seriously question two statements on page 36. "The major part of this growth is expected to be in the Parker and Lake Havasu City areas, and substantial land acreage will be needed for community growth and development." "This in turn creates a demand for vacation-retirement homesites, which is not currently provided by the Parker-Havasu areas."

On the basis of our recent subdivision survey, it appears there is enough private subdivided land available along the Colorado River to accommodate population increases for a considerable time.

10. The language on pages 66 and 77 carries an implied contradiction that should be explained more carefully. On page 66 it says special measures could be taken to provide protection to reduce harrassment of wildlife populations in the area. It also says restrictive measures to limit public access could reduce the impact. On page 77 it says adjoining public lands will be traversed by all uses associated with urbanization and management would become more difficult. On the one hand BLM seems to be willing to try special measures to protect wildlife and public lands; on the other hand they don't. Perhaps some qualifying sentences can be added to describe what BLM feels it can achieve under one set of circumstances that it can't under another.
11. The statement on page 78 & 79 is questionable where it says a reduction in acreage would reduce all environmental consequences only where urbanization density is also relatively reduced. That statement ignores the unique natural characteristics of each parcel of land in question. A reduction of acreage on some critical riparian lands might significantly reduce environmental consequences.

Memorandum
Arizona State Clearinghouse
September 25, 1973
Page 3

12. The first sentence on page 80 is also questionable. "It is questionable whether other sites with potential for urbanization could be identified on public domain where an environmental impact of similar nature would not result from a townsite development." This appears to ignore the uniqueness of that portion of the Bill Williams River Valley and the importance of the threatened wildlife species such as the bighorn sheep and antelope.
13. There is concern whether there can be any guarantee that the proposed development would occur as described. Perhaps an alternative should be added where the Federal government would guide the growth process through a series of deed restrictions and legal agreements that would guarantee the protection of certain natural characteristics both on and off the proposed site. Can BLM place restrictions on the use of land it exchanges into private ownership?
14. The last paragraph on page 79 is important. It correctly shows the necessity for decisions of this nature to be placed within the framework of a Statewide land use plan. This is true not only for a substitution, but also for the proposal itself. If a substitution of this nature should be made within the framework of a Statewide land use plan, so should the original proposal for the land exchange.

OFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT

3003 NORTH CENTRAL AVENUE • SUITE 1704 • PHOENIX, ARIZONA 85012 • (602) 271-5371

MEMORANDUM

TO: Arizona State Clearinghouse

FROM: Dave Hamernick *DH*

DATE: September 26, 1973

SUBJECT: Planet Townsite-Draft Environmental Statement
#73-80-0024

The following information^{is} provided to further explain my statement in the September 25 memo under item #9. That statement was, "it appears there is enough private subdivided land available along the Colorado River to accommodate population increases for a considerable time."

Two population projections have been made for Mohave County in the year 1990. They differ primarily on the basis of migration assumptions. The low estimate is 41,900. The high estimate is 105,000.

The Office of Economic Planning and Development's subdivision study identified four geographic areas where most of the new settlement activity is going. These four areas contain 87% of all subdivision structures. Three of the four areas are immediately adjacent to the Colorado River. They are the Bullhead City-Riviera Complex, the Lake Havasu City Complex, and the Fort Mohave Reservation Strip Complex. The fourth area is located adjacent to the City of Kingman. The population capacity of these four areas is 168,000 people. The capacity of the three areas along the Colorado River is 138,000 people. These estimates are based on the assumption no more land will be subdivided. Actually, over 3,000 additional lots per year are being subdivided in Mohave County, so the capacity figures may have to be revised upward in the future.

A total of 68,587 lots have been inventoried in the areas we have said have the greatest potential for future settlement. We use this figure to conclude there is enough private land available to accommodate population increases for a considerable time.

Response to Comments

by

Arizona Office of Economic Planning and Development

Comment: Additional information offered concerning projected population growth in Mohave County.

Response: None.

Comment: Suggested 14 items of information that should be included in the final EIS.

Response: The text and maps in the final EIS have been revised to include the information wherever possible. Specific responses to each of the 14 items are:

1. Maps were included in the draft statement and are included in the final statement.
2. BLM does not lease any land to Arizona Ranch and Metals now and would not lease any after the proposed exchange. AR&M does have a license to graze cattle on Federal lands in the area and would continue to be licensed on Federal lands remaining in the area.
3. Water rights attached to the land to be transferred to the Federal Government would remain with the land and would then be owned by the Government.

Arizona Office of Economic Planning and Development, cont'd

4. The private lands offered in the revised exchange by Arizona Ranch and Metals Co. include 1,280 acres of desert vegetation.
5. Riparian vegetation on lands owned by Arizona Ranch and Metals Co. being offered for exchange below the Narrows is dying at this time. This may be the result of increased pumping on the middle and upper ranches in recent years for irrigation purposes.

This land is no longer in the revised exchange proposal.

6. The only developments proposed that would be affected by the 100-year flood plain zone are the roads that would cross the Bill Williams River and Castaneda Wash.
7. No definite plans or proposals for protection of wildlife, both on site and off site, have been made at this time.
8. The Recreation and Public Purposes Act of April 14, 1926, as amended, provides for use of public lands for sanitary landfills. However, under the modified development proposal, private land can accommodate the sanitary landfill.

Arizona Office of Economic Planning and Development, cont'd

9. The statement covering demand has been revised in the final EIS. The DEPAD study (Appendix G) was not available at the time the draft was prepared.
10. The statements that appeared on page 66 of the draft statement were in the section of the draft entitled "Mitigating Measures Included in the Proposed Action." Those on the draft were in the section entitled "Adverse Effects Which Cannot be Avoided Should the Proposal be Implemented."
11. It is not proposed that any riparian lands be developed. The intent of the wording in this section was to point out that reduction in acreage would reduce impact only where urbanization density is also reduced.
12. It was not the intention to ignore the uniqueness of the Bill Williams River.
13. It is the feeling of the Bureau of Land Management that State and local planning and zoning agencies should accept the responsibility of guiding a development of this type.
14. No comment.



Arizona Commission of
Agriculture and Horticulture

P.O. BOX 6189 • PHOENIX, ARIZONA 85005 • 271-4191



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| ARIZONA STATE OFFICE OF LAND MANAGEMENT | |
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April 23, 1973

State Director, Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, AZ 85023

Re: Statement Control Number INT DES-73-18
Subject: Environmental Impact Statement
Applicant: Bureau of Land Management
Project Title: Planet Townsite

Dear Sir:

This is in response to a "Notice" received in this office on April 13 which was accompanied by a "Draft Environmental Impact Statement for the Proposed Planet Townsite". Below I have made various comments which I believe are pertinent in keeping with our responsibilities where the Arizona Native Plant Law is concerned.

Certain vegetation lying within the Planet Townsite, and on private property is not protected by the Native Plant Law and need not be cause for concern. The Commission feels, however, that protected native species, as underlined in red in the enclosed copy of the Native Plant Law, should not be destroyed but set aside and replanted in the area, or moved to some other suitable location. Many of these plants cannot be renewed by natural replacement in our lifetime.

The Havasu City development is evidence of this problem. The townsite was completely cleared of any vegetation and so homeowners and nurserymen, seeking desert plants to landscape properties in Havasu City, illegally removed protected native plants from adjacent State and Federal lands. These treks into the desert destroyed other desert vegetation and contributed to erosion by the indiscriminate use of off-road vehicles.

Pertaining to the report of water conditions and quality on the townsite, the future residents probably will go to low-maintenance native plant landscaping because of water costs and high salinity content of the water.

If at all possible some effort should be made to leave as much of the desert vegetation on the residential lots and park areas during development of the townsite in order to give the potential lot buyer a choice of landscaping materials he may wish to use on his lot.

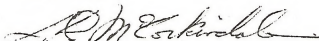
State Director
Vureau of Land Management

- 2 -

Page 2

Personnel from the Arizona Commission of Agriculture and Horticulture will be sincerely interested in discussing any aspects of the Arizona Native Plant Law with the Bureau of Land Management personnel.

Sincerely,



L. D. McCorkindale
Director and
State Entomologist

LDM/ms - enc.

cc: Honorable Jack Williams
Dr. Hubert Earle
R. K. Perry
R. A. Countryman



Arizona Commission of Agriculture and Horticulture

P.O. BOX 6189 • PHOENIX, ARIZONA 85005 • 271-4191



ARIZONA NATIVE PLANT LAW

Arizona Revised Statutes, Chapter 7

ARTICLE 1. PROTECTION

Sec. 3-901. Protected group of plants; botanical names govern; power to add or remove plants

A. The botanical names of the plants referred to in this article shall in all cases govern in the interpretation of this article. Protected native plants shall be any plant or part thereof, except its fruit, named in the protected group which is growing wild on state land or public land or on privately owned land without being propagated or cultivated by human beings.

B. The following shall constitute certain protected native plants that are prohibited from collection except for scientific or educational purposes under permit from the commission of agriculture and horticulture: Washingtonia filifera (fan palm), lysiloma thornberi (ornamental tree), bursera fagaroides (elephant tree), cereus schottii (santa or "old one"), cereus thurberi (organ pipe cactus), toumeya papyracantha, toumeya neeblesiana, neoevansia diguetii (dania cactus), pediocactus paradinei.

C. The following shall constitute the protected group of plants:

1. All species of the following families: liliaceae (lily family), amaryllidaceae (amarilly family), orchidaceae (orchid family), crassulaceae (ornine family), cactaceae (cactus family),

2. All species of the following genera: aquilegia (columbine), lobelia (lobelia), dodecatheon (shooting star), primula (primrose), fouquieria (ocotillo).

3. The following species: atriplex hymenelytra (desert holly), cercis occidentalis (western redbud), dalea spinosa (smoke tree), holacantha emoryi (crucifixion thorn), fremontia californica (flannel bush), pinus aristata (bristlecone pine).

D. The Arizona commission of agriculture and horticulture may, after public hearing, add or remove any native plant to or from the protected group. A public hearing on native plants shall be held at least every twelve months.

Sec. 3-902. Native plant permits and tags; fees; regulatory powers of commission

A. The commission of agriculture and horticulture shall issue permits, tags and seals for a fee as prescribed by the commission, which fee shall not be less than one dollar per plant for all native plants except cereus giganteus (saguaro) and not less than two dollars per plant for each cereus giganteus (saguaro).

to persons who take protected native plants from their original growing sites. No person, except as provided in this article, shall take or transport or have in his possession any protected native plant from its original growing site in the state of Arizona unless at the time of taking he has a valid permit therefor on his person, attaches the tags or seals to the native plants at the time of taking and exhibits the permit and tags or seals upon request for inspection by any duly authorized agent of the Arizona commission of agriculture and horticulture or by any peace officer as provided for in this chapter. No tag is valid unless it is issued with a valid permit and such permit bears the tag or seal number on its face.

- B. With each permit authorizing the taking, transporting or possessing of protected native plants, the commission shall provide such tags and seals as the commission may prescribe, which the permittee or his agent shall attach to the protected native plants at the time of taking and before transporting and in such manner as prescribed by the commission. After any protected native plant has been legally taken and tagged as provided by this article, it shall be unlawful to remove such tag or seal until the plant has been transplanted into its ultimate site for landscaping or beautification purposes. Removal of the tag or seal from the plant shall be only by an agent of the commission or by the ultimate owner of the plant, who shall retain such tag or seal as proof of ownership. No permit or tag or seal as such is transferable by the permittee or his agent, nor shall it be used by anyone except that person to whom such permit or tag or seal was issued, nor shall it be used for more native plants than indicated thereon and no refunds shall be made for the purchase thereof. Any permittee shall be responsible for the acts of any other person or persons acting under any authority expressed or implied of the permittee.
- C. The commission of agriculture and horticulture may make necessary rules and regulations not in conflict with this chapter for the enforcement of its provisions.
- D. The commission of agriculture and horticulture is empowered and directed to enter in or upon any premises or other place, train, vehicle or other means of transportation within or entering the state, suspected of containing or having present therein or thereon protected native plants in violation of this article.
- E. When any power or authority is given by any provision of this article to any person, it may be exercised by any deputy, inspector or agent duly authorized by such person. Any person in whom the enforcement of any provision of this article is vested has the power of a peace officer as to such enforcement.

Sec. 3-904. Taking of plants; permit; tag fees; importation; exceptions

- A. Except as provided in this article, it is unlawful for any person to destroy, dig up, mutilate or take any living plant, except seeds, of the protected group from state land or public land without obtaining a permit and tags or seals from the Arizona commission of agriculture and horticulture, or from private land without obtaining written permission from the landowner, and a permit and tags or seals from the commission of agriculture and horticulture. It shall be unlawful for any person to falsify any paper or document issued to give permission for any person to take native plants of the protected group or to take more native plants than authorized by the permit.
- B. The commission of agriculture and horticulture may give written permission for a person or a scientific or educational institution to take a definite number of specified plants in the protected group from areas specified by the commission for scientific or educational purposes. In addition the commission may

give written permission for a person to take specific plants or parts of plants in the protected group from areas specified by the commission for manufacturing or processing purposes and assess reasonable and proper fees for such taking of the plants or parts thereof. It is unlawful, for any person or scientific or educational institution to misuse a permit in any manner.

- C. Any permit provided by subsections A and B shall expire when the tags or seals issued therewith have been attached to the plants covered by such permit and such plants are no longer in the possession of the permittee. Any permit shall be valid until expiration or for one year from date of issuance, whichever occurs first, except that any permit and the tags or seals issued therewith shall be null and void when the land on which the plants are growing, as described in the permit, changes ownership, unless the new owner certifies in writing that the permittee may continue taking such plants as specified on the permit.
- D. Nothing in this article shall be construed to prevent the clearing of land, cleaning or removal of protected native plants from a canal, lateral ditch, survey line, building site, or road or other right-of-way by the owner of the land or his agent unless such protected native plants are to be transported from the land or offered for sale.
- E. The commission of agriculture and horticulture shall collect fees for the issuance of permits and tags under this article, except for scientific and educational purposes, and from a landowner moving protected plants from one of his properties to another, providing that no such plants are to be offered for sale.
- F. Any protected native plant found without a valid tag or seal securely and properly affixed thereto when being taken, transported, sold, or in possession by any person may be confiscated as evidence of a violation.

Sec. 3-905. Shipment of plants; exhibition of permit and certificate of inspection to carrier

No person or common carrier shall transport a plant, or any part thereof, belonging to the protected group, nor receive or possess a protected native plant for transportation within or without the state, unless the person offering the plant for shipment exhibits to the person or common carrier a valid written permit for the transportation of the plant or part thereof, and has securely and properly attached thereto a valid native plant tag or seal. If for transport without the state, the plant shall also bear a certificate of inspection by the commission. All protected native plant species or varieties, when not grown in Arizona and imported into this state, shall be declared at an Arizona agricultural inspection station or a district office of the commission, and proceed to destination under quarantine orders issued by agents of the commission employed at such station or district office.

Sec. 3-906. Arrests without warrant; confiscation of plants

A peace officer or an officer or employee of the commission of agriculture and horticulture may, in the enforcement of this article, make arrests without warrant for a violation of this article which he may witness, and may confiscate plants or parts thereof belonging to the protected group when unlawfully taken, transported, possessed, sold or otherwise in violation of this article.

Sec. 3-907. Violations; penalties

A person violating any provision of this article is guilty of a misdemeanor punishable by a fine of not less than fifty dollars nor more than three hundred dollars,

for each violation or by imprisonment in the county jail not to exceed ninety days, or both, and each violation constitutes a separate offense.

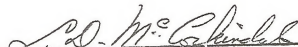
Sec. 3-908. Arizona commission of agriculture and horticulture fund

- A. All fees or monies collected under the provisions of this article shall be deposited with the state treasurer at the end of each month, who shall place it in a special fund which is created to be known as the Arizona commission of agriculture and horticulture fund.
- B. Ninety per cent of all money deposited with the state treasurer shall constitute a separate and permanent fund for the use of the Arizona commission of agriculture and horticulture in the enforcement of the provisions of this chapter, and ten per cent shall be credited to the general fund of the state.

Approved by the Governor - May 22, 1972

Filed in the Office of the Secretary of State - May 22, 1972

Effective - August 13, 1972


L. D. McCorkindale, Director and State
Entomologist

LDM/ms
500

Response to Comments

by

Arizona Commission of Agriculture and Horticulture

Comment: Points out that vegetation growing on private property is not covered by the Arizona Native Plant Law. Suggests that certain plants be saved and replanted. Lists problems associated with the development of Havasu City. Feels that most landscaping will be done using native plants, and vegetation should be left on lots.

Response: These suggestions are listed in the text as possible mitigating measures to reduce impacts on vegetation if the exchanges are consummated and a town developed in the area.

Governor
JACK WILLIAMS

Commissioners

HOMER L. G. KRYGER, Chairman, Yuma
MILTON G. EVANS, Flagstaff
ROBERT J. SPILLMAN, Phoenix
GLEN D. DALY, Winslow
CHARLES F. ROBERTS, O.D., Bisbee

Director
ROBERT A. JANTZEN



Asst. Director, Operations
PHIL M. COSPER

Asst. Director, Services
ROGER J. GRUENEWALD

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

June 27, 1973

Mr. Joe Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Mr. Fallini:

Our Department has reviewed the Draft Environmental Statement for the proposed Planet Townsite in Mohave County, Arizona dated March 29, 1973.

In view of the potential impact that this development project will have on wildlife and its habitat and in view of the unknown or partially understood impacts, we are concerned with these impacts and, therefore, question the desirability of the proposed land exchange in its entirety.

We see a certain degree of wisdom and desirability in a modified exchange, especially one whereby the federal government would acquire the private land adjacent to the Bill Williams River. This would be desirable from a wildlife management position.

The Bureau of Land Management's environmental statement adequately covers the modified exchange as an alternative. In fact, the entire statement is well written and adequately covers the important facts that are necessary for a good statement.

With regards to wildlife, we are mostly concerned with those species of wildlife already having a precarious existence without the proposed development.

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| ARIZONA STATE OFFICE B.L. LAND MANAGEMENT | |
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| RESOURCES | 4 |
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The Yuma clapper rail could have its numbers reduced further if the riparian vegetation of the Bill Williams River is reduced or modified. Acquisition of these riparian areas by the federal government would provide a measure of protection.

However, with regard to these wetland habitats to be acquired through exchange, we are concerned that they will be subject to modification through water uses associated with the intensive development.

Projected human disturbance on bighorn sheep populations would have an undesirable effect on this unique ungulate.

Projected human disturbance and additional land development in this area will, in all probability, eliminate the local population of Mexican pronghorn antelope.

The proposed townsite also harbors good numbers of Gambel's quail, whitewing doves, mourning doves, and a limited population of desert mule deer. These species would not be "displaced" as anticipated in the statement summary, but would probably be removed.

Finally, it appears that the ultimate fate of wildlife in this area and vicinity will depend on land use planning, zoning, and other measures and conditions imposed by Mohave County.

Those areas of critical environmental concern as described in the statement should be dedicated as green belts, flood plains, open space, wildlife habitat, etc., with deed restriction precluding development in future years.

Areas of critical environmental concern can be preserved in planned communities if planning, zoning restrictions, and regulations provide for this protection.

Mr. Joe Fallini

- 3 -

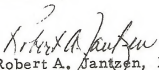
June 27, 1973

Finally, we are concerned with the impact of the use of water in this area. We know that the Bill Williams River will experience a certain depletion as mentioned in the environmental statement. We feel that a use study of water and its relationship to other resources might be appropriate.

In conclusion, we feel that in the public interest the best alternative would be no project with the second best as the modified exchange.

The Game and Fish Department appreciates the opportunity to review and comment on the Planet Townsite Environmental Statement.

Sincerely,


Robert A. Jantzen, Director

RAJ;iw

Response to Comments

by

Arizona Game & Fish Department

Comment: Expressed concern over impacts on wildlife and questioned the desirability of consummating the exchange as proposed. Principally concerned with species of wildlife that are already having a precarious existence.

Response: The impacts on wildlife are discussed in the text.

Comment: Riparian land to be acquired would possibly benefit the Yuma clapper rail but there is the possibility that water consumption by the proposed city would alter wetland habitat.

Response: The statement acknowledges this possibility.

Comment: Development of townsite would have an undesirable effect on bighorn sheep and, in all probability, eliminate the local population of Mexican pronghorn antelope.

Response: The text has been revised to reflect this possibility.

Comment: Certain species of wildlife would be removed rather than displaced.

Response: The summary page has been revised. This is based on the assumption that if all existing habitat is presently occupied, then elimination of any habitat by changing land use will result in a proportional loss of the species of wildlife occupying the habitat.

Arizona Game & Fish Department, cont'd

Comment: The last several paragraphs on page 2 contain zoning and land use planning recommendations.

Response: State and local planning and zoning authorities have responsibility for control of development of private lands.

Comment: Concern expressed over impact of water use. Suggest a use study of water and its relationship to other resources be made.

Response: The most detailed study that is available concerning water in this area was prepared by Samuel Turner in August 1962. This report was updated by Mr. Paul A. Manera, consulting hydrologist, Phoenix, Arizona, by letter dated October 13, 1971. This report and correspondence from the Arizona Water Commission dated July 20, 1972, all indicate that there is sufficient water available to support the proposed development.

The impact of using this water is not fully understood with respect to downstream riparian vegetation.

Turner states on page 46 of his report that in August 1962, there were 1,680.5 acres mapped as a phreatophyte area; he estimated that these plants used 5,943 acre feet of water per year.

See Appendix J.



JACK WILLIAMS
GOVERNOR

OFFICE OF
State Land Department
STATE OF ARIZONA
Phoenix, Arizona 85007

ANDREW L. BETTWY
STATE LAND COMMISSIONER

April 23, 1973

Mr. Joe T. Fallini, Director
Bureau of Land Management
Federal Building
Phoenix, Arizona 85025

Re: INT DES 73-18

Dear Mr. Fallini:

The State Land Department supports the proposal for the Plant Townsite and the related State-Federal exchanges and or selections as well as the concept of the Federal-private exchanges to consolidate various holdings.

Sincerely,

Andrew L. Bettwy
Andrew L. Bettwy

ALB:bka

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Response to Comments

by

Arizona State Land Department

Comment: Supports proposal for consolidation of various holdings.

Response: As pointed out in the text, the State Land Department was a party to the original proposal for exchanging lands. The State feels that the increase in value of State lands as a result of the development would benefit the State school fund.



STATE OF ARIZONA
DEPARTMENT OF MINERAL RESOURCES
MINERAL BUILDING, FAIRGROUNDS
PHOENIX, ARIZONA 85007

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May 25, 1973

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, Arizona 85025

Dear Sir:

Thank you very much for the opportunity to comment on the Environmental Statement for the Planet Townsite. The Bureau of Land Management is to be commended for their excellent job in preparing the environmental statement.

The Arizona Department of Mineral Resources has no specific comments on the proposed land exchange or planned townsite. Our only concern involves the relationship between the proposed townsite and the future mineral potential of the Planet mine area. We sincerely hope this is kept in mind and nothing will be done to create a potential conflict.

Thank you again for the opportunity to comment.

Sincerely,

Ken A. Phillips,
Mineral Resource Specialist

KAP/GCS

Response to Comments

by

Arizona State Department of Mineral Resources

Comment: Expressed concern for the possibility of a future conflict between mining and residential development.

Response: No serious conflicts have been identified at this time, since the known mineralized areas are located south of the proposed development. Should mining operations start in the future, there is a possibility that conflicts would occur with mining operations necessary for the hauling and processing of ore.

It should be noted that the existing road from Havasu Springs to the Planet Ranch headquarters was constructed in 1967 for the purpose of providing a reasonable route of transportation for the Mineral Hill Mine which was then employing some 60 workers, most of whom resided in the Parker area. The road also assisted in the transportation of ore from the mine.



ARIZONA STATE PARKS

1688 West Adams
Phoenix, Arizona 85007
Telephone 271-4174
DENNIS McCARTHY, Director
WALLACE VEGORS, Assistant Director

JACK WILLIAMS
Governor

STATE PARKS BOARD MEMBERS:
B. MARC NEAL, Chairman, Kingman
DELL TRAILOR, Vice Chairman, Phoenix
RALPH G. BURGBACHER, Secretary, Phoenix
ANDREW L. BETTWY, Phoenix/ A.C. WILLIAMS,
Prescott/ DUANE MILLER, Sedona/ RICKI RARICK, Tucson

May 15, 1973

Mr. Joseph Fallini
State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Joe:

The staff has just completed a review of the draft of the Planet Town Site Environmental Statement. We see no references in the Statement to the Historic Site Preservation Act of 1966 nor the implementation of Executive Order 11593. We would like to be informed whether the lands proposed for exchange have been inventoried in conformance with the Executive Order and that no valuable cultural assets are being jeopardized by the potential trade.

Sincerely,

Dennis
DENNIS McCARTHY
State Parks Director

DM:nl

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Response to Comments

by

Arizona State Parks

Comment: Suggest that the final statement include references to the Historic Site Preservation Act of 1966 and Executive Order 11593.

Response: The statement has been revised to reflect the following: Three areas are presently under study to determine if they would qualify for nomination to the National Register.

There are no sites presently designated that would be affected by the proposal. See letter from Arizona State Parks dated December 18, 1973, in Appendix F.



ARIZONA STATE PARKS

1688 West Adams
Phoenix, Arizona 85007
Telephone 271-4174
DENNIS MCCARTHY, Director
WALLACE VEGORS, Assistant Director

JACK WILLIAMS
Governor

STATE PARKS BOARD MEMBERS:

B. MARC NEAL, Chairman, Kingman
DELL TRAILOR, Vice Chairman, Phoenix
RALPH G. BURGBACHER, Secretary, Phoenix
ANDREW L. BETTWEY, Phoenix/
Prescott/ DUANE MILLER, Secretary, Tucson

December 18, 1973

Mr. Joe T. Fallini
State Director
Bureau of Land Management
3022 Federal Building
230 North First Street
Phoenix, Arizona 85025

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Re: Proposed Planet Townsite
Development

Dear Mr. Fallini:

In response to your letter of November 1, 1973, my comments are as follows:

1. There are no sites in the described area that are presently on the National Register of Historic Places. However, I wish to state strongly that compliance with Section 1(3) and 2(b) of Executive Order 11593 should be demonstrated. Since a rather complex land exchange is involved in the proposed development of Planet Townsite it is imperative that an adequate survey be made of both pre-historic sites, as discussed on pp. 26-27 of the draft environmental statement, and such historic cultural resources as might exist. The Planet Ranch itself played an important role in the early history of the area. There are known Indian petroglyphs and Indian camp sites in the general area as well as the important early man sites (San Dieguito complex) already located within the Federal lands proposed for exchange. It should be clearly determined if sites comparable to the San Dieguito ones or sites of other cultural affiliations exist on lands other than those Federally owned, since these will be ultimately involved in the total picture of development.

Mr. Joe T. Fallini
December 18, 1973
Page 2

2. Impact on the access points of Lake Havasu State Park will be affected by the demographic increase of approximately 20,000 persons on completion of the envisioned townsite. The facilities and the fragile natural environment of the lake will be taxed by the present and projected increased use through normal growth of existing population centers. A large additional population center could create a situation which would put a heavy load upon the available facilities and the ability of the lake accesses to support the people impact of the proposed townsite.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis McCarthy". The signature is fluid and cursive, with a large, sweeping "D" and a long, trailing flourish at the end.

DENNIS MCCARTHY
State Parks Director
State Historic
Preservation Officer

DM:DH:ol

Response to Comments

by

Arizona State Parks

Comments: It is imperative that adequate surveys be made.

Response: An intensive cultural resource has been done on the Federal land proposed exchange with the National Register of Historic Places and Yuma and Phoenix District (BLM) files were consulted for information on non-Federal lands. BLM has no authority to construct on the ground surveys on non-BLM lands.

Department of Conservation
Department of Fish and Game
Department of Navigation and
Ocean Development
Department of Parks and Recreation
Department of Water Resources



Air Resources Board
Colorado River Board
San Francisco Bay Conservation and
Development Commission
State Lands Commission
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Board

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

JUL 17 1973

Mr. Joseph T. Fallini
State Director
Bureau of Land Management
U. S. Department of the Interior
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, AZ 85025

Dear Mr. Fallini:

The State of California has reviewed the "Planet-Townsite Draft Environmental Statement" which was submitted to the Office of Intergovernmental Management (State Clearinghouse) within the Governor's Office. The review accomplished by the State fulfills the requirements under Part II of the U. S. Office of Management and Budget Circular A-95 and the National Environmental Policy Act of 1969.

The Statement has been reviewed by the State Departments of Fish and Game and Water Resources; the State Water Resources Control Board; and Colorado River Board of California. The State's comments are the following:

The State of California is concerned about the effect that this proposal would have on the National Wildlife Refuge in the Bill Williams Arm of Lake Havasu and within the riparian area of the Bill Williams River; a large number of the migrating Canada goose population and the ducks using this part of the Colorado River concentrate in that area. The new townsite development with the access roads and increased human use of the area will discourage or prevent many of these birds from remaining within the refuge area where they have been seeking food and rest. These birds contribute substantially to hunting and other recreational uses in California.

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Mr. Joseph T. Fallini

-2-

We suggest that the alternative of no action be given further consideration. Through control of federal lands and access thereon, future community developments would be encouraged at presently developed townsites in nearby areas.

Thank you for the opportunity to review and comment on this Statement.

Sincerely yours,

N. B. LIVERMORE, JR.
Secretary for Resources

By Paul L. Clifton

Response to Comments

by

The Resources Agency of California

Comment: Expressed concern for the proposal's impact on Havasu Refuge and possible impacts on numbers of waterfowl that contribute to hunting and other recreational uses in California.

Response: Possible adverse impacts are noted in this statement. United States Bureau of Sport Fisheries & Wildlife letter dated May 25, 1973, also addresses this issue (Appendix F).

Comment: Control of Federal lands and access would encourage more development at presently established townsites in nearby areas if the proposed exchanges were not consummated.

Response: As indicated in the statement, there is good reason to believe that economic consideration will cause the land owner to attempt some sort of development even if the proposed land exchange is not consummated. It is true, that in the absence of an exchange, the proposed development may not be as attractive to prospective lot purchasers. As pointed out in the text the location of townsites is largely the responsibility of State and county planning and zoning organizations.

DEPARTMENT OF WATER RESOURCES

P. O. BOX 388
SACRAMENTO 95802



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JUN 11 1973

State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 North First Avenue
Phoenix, AZ 85025

Dear Sir:

This is in reply to your "Notice" transmitting the "Draft Environmental Impact Statement for the proposed Planet Townsite" dated 1973. The Department of Water Resources is in the process of preparing the State's comments on the same Impact Statement. Therefore, our comments will be incorporated therein.

Sincerely yours,

for Director

Mohave County Board of Supervisors



P.O. BOX 390 • KINGMAN • ARIZONA 86401

DONALD A. ALDRIDGE
CHAIRMAN

W. B. KETCHNER, O. D.
MEMBER

JAMES H. HOWELL, D. D. S.
MEMBER

~~JOHN STUBBS~~ George F. Anast
COUNTY MANAGER

GAUL KESLER
CLERK

May 21, 1973

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Mr. Joseph T. Fallini
State Director
Bureau of Land Management
Room 3047, Federal Building
First Avenue and Van Buren
Phoenix, Arizona 85003

Dear Mr. Fallini:

The Mohave County Board of Supervisors has reviewed the Planet Townsite Draft Environmental Statement prepared by your office.

The proposed exchange of lands appears to be in the public interest for the following reasons:

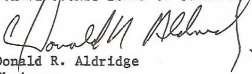
1. Lands of importance to wildlife will be conveyed to Federal ownership and will be included in the Havasu Migratory Wildfowl Refuge as was recommended in the Lower Colorado River Land Use Plan (Department of Interior, 1964.)
2. Federal, State and private holdings will be consolidated, making for more efficient administration of both Federal and State lands.
3. The private land owner, Arizona Ranch and Metals Company, will be able to develop a unified and well planned community on desert lands and will be relieved of the necessity of selling off its unique lands along the Bill Williams River in T11N, R17W for mobile home development and will be conveying these environmentally important lands into public ownership.

Page two
May 21, 1973

For these reasons, and because we believe the proposed development will be an asset to Mohave County, we support the proposed exchange and urge BLM to proceed with it.

Sincerely,

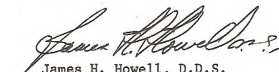
MOHAVE COUNTY BOARD OF SUPERVISORS



Donald R. Aldridge
Chairman



Wayne B. Ketchner, O.D.
Member



James H. Howell, D.D.S.
Member

BOS:jp

Response to Comments

by

Mohave County Board of Supervisors

Comment: Expressed support for the proposal.

Response: AR&M indicates that they worked closely with the Mohave County Board of Supervisors in the initial development of their proposal.



ARIZONA CONSERVATION COUNCIL

P. O. BOX 11312
Phoenix, Arizona 85061

ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

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Mr. Joe T. Fallini, State Director
Bureau of Land Management
Arizona State Office
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Mr. Fallini:

We would like to thank the Bureau of Land Management for offering the Arizona Conservation Council this opportunity to comment on the Planet Townsite Environmental Statement. The EIM is to be commended for the effort represented by the scope of this study.

We are in general agreement with the impact as noted by this study. We are, however, bothered by the following assumptions which seem to prevail in developing the statement:

- (1) The Planet Townsite is a needed facility.
- (2) The developer will keep his promises to develop in a manner to minimise the environmental impact.
- (3) The Planet Townsite will eventually grow to its planned size.

As you probably know Arizona is already developed to accommodate a population of several million more people than there are presently residing here. With the priorities on land planning and resource conservation emerging as they presently are, it would not be in the best interest of the public to sponsor a speculative development. Because of this we feel the following conditions are needed.

Initial development should proceed without the exchange of Federal lands but with the assurance that such exchanges are available only if and when:

- a. The apparent growth and on site development (not speculative purchase of lots) display a need for such exchanges.
- b. The promised development standards to minimize impact along with the proper covenants and restrictions to guarantee them are adopted and in effect in the initial community established.

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AMERICAN CAMPING ASSN • AMERICAN INSTITUTE OF PLANNERS • ARIZONA WILDLIFE SOCIETY • ARIZONA ASSN OF LANDSCAPE ARCHITECTS
ARIZONA EDUCATION ASSN • ARIZONA FEDERATION OF GARDEN CLUBS • ARIZONA FEDERATION OF WOMENS CLUBS • AMERICAN YOUTH HOSTELS
ARIZONA RIFLE & PISTOL ASSN • ARIZONA STATE HORSEMENS ASSN • ARIZONA OUTDOOR WRITERS ASSN • ARIZONA ROADSIDE COUNCIL
ARIZONA PARKS & RECREATION ASSN • ARIZONA VARMINT CALLERS ASSN • AUDUBON SOCIETY • SIERRA CLUB • ENVIRONMENTAL CONSCIENCE

UNIVERSITY OF ARIZONA WILDLIFE SOCIETY • ARIZONANS IN DEFENSE OF THE ENVIRONMENT



ARIZONA CONSERVATION COUNCIL

Page 2 : Planet Townsite Environmental Impact Comments

- C. Sites that are not built on within a year after purchase can be exchanged for more remote sites of similar value to minimize the utility expense for those that do build by congregating sites into one area.

If these conditions are assured then there can be little argument with the observation that the exchange will help minimize the overall impact. However, if the developer changes through business shifts or other factors the exchange would be a catalyst for the growth of a undesirable development. In any case it would seem that a land exchange bound by such conditions and delay would do little harm to a responsible developer and would allow the BLM and the public a chance to evaluate those factors about the development which are not available at this time.

Thank you for this opportunity again.

Sincerely,

Lyndon Keefer

Chairman

Arizona Conservation Council

cc: Congressional Delegation

Response to Comments

by

Arizona Conservation Council

Comment: Express concern over assumptions that (1) the townsite is needed; (2) the developer will keep his promises; and (3) the townsite will grow to its planned size.

Response: Since this statement is attempting to analyze a proposed development and not an existing one, certain assumptions must be made. The text of the statement states that if the exchange is consummated the deed would not contain any covenants governing the use to which the lands would be put or the conditions of such use.

Comment: The exchange of lands should not be made until the private lands have been developed. This would allow the developer the opportunity to prove that the proposed townsite was not merely a speculative venture.

Response: Arizona Ranch and Metals Co. has indicated they would develop a community regardless of the outcome of the proposed exchange.



ARIZONA CONSERVATION COUNCIL

P. O. Box 11312 Phoenix, Arizona 85061

September 29, 1973

Mr. Joe T. Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Re: Planet Townsite- Draft Environmental Statement

Dear Mr. Fallini:

At the request of Mr. Walter Smith I have again reviewed the Planet Townsite land exchange with the Board of Directors of the Arizona Conservation Council and with members of the council who would have particular knowledge and interest in this exchange. The result of this review was a general concurrence with our original statement.

I would like to express at this time my difference with suggestions which were made at times that the Bureau of Land Management's impact statement was inadequate. As one who has reviewed many draft impact statements I thought the Bureau staff did an admirably good job on a complex subject during complex times.

The Arizona Conservation Council would again like to express our our gratitude to your agency and staff for the many opportunities of public participation and service which you have offered.

Sincerely,

Lyndon Keefer, Chairman
Arizona Conservation Council

cc: Arizona Dept. of Economic Planning and Development

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Response to Comments

by

Arizona Conservation Council

Comment: This is a second letter reaffirming their position.

Response: See comments following Arizona Conservation Council's
letter of June 5, 1973.

ARIZONA DESERT BIGHORN SHEEP SOCIETY INC.

P. O. Box 5241 • Phoenix, Arizona 85010

May 23, 1973

Arizona State Office
Bureau of Land Management
Department of the Interior
3022 Federal Building
Phoenix, Arizona 85025

Reference: Land Exchange of Proposed Planet Townsite Near
Bill Williams River, Mohave County, Arizona

Gentlemen:

The environmental impact statement for the proposed Planet Ranch land exchange has been reviewed by the Arizona Desert Bighorn Sheep Society and we are vitally concerned with the potential loss of significant bands of desert bighorn sheep.

The impact statement points out the adverse effect that would be realized by encroachment on the native bighorn sheep habitat. The proposed townsite on the Planet Ranch along the Bill Williams River would result in loss of habitat and sheep, similar to that experienced from the development of Lake Havasu City. Continued large scale development of this type would eventually result in the total annihilation of native Arizona Desert Bighorn Sheep on lands bordering the Colorado River from Kingman to Yuma.

We recognize the fact that development of some lands is inevitable with increasing influx of population and the increased desire and needs for recreational developments. Unfortunately, the encroachment of native wildlife is a permanent, and for all practical purposes, irreversible process. The loss of natural range and lambing grounds is pointed out in the impact study as being a predictable outcome of the proposed townsite.

It is strongly recommended that maximum consideration be given to the preservation of the Bighorn Sheep habitat by considering possible alternate utilization of the lands in the Planet Ranch area.

Whereas the proposed Planet townsite would have immediate and devastating effects on the survival of a significant portion of the native Arizona Desert Bighorn Sheep population, we hereby state our opposition to the development of the Planet townsite as currently proposed.

Sincerely yours,

Cecil LaVance
Cecil LaVance, President

Response to Comments

by

Arizona Desert Bighorn Sheep Society Inc.

Comment: Concerned with potential loss of desert bighorn sheep. Feel consideration should be given to alternative uses of lands in Planet Ranch area. States opposition to the townsite as currently proposed.

Response: The statement recognizes that the proposed development would have impact on wildlife. The desert bighorn sheep are discussed in detail in the text, and it is recognized that any development that results in disturbance of bighorn sheep habitat is detrimental to the survival of this species.



ARIZONA WILDLIFE FEDERATION

P.O. Box 1769 • Phoenix, Arizona 85001 • Phone 602-253-4903



June 21, 1973

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Mr. Joe T. Fallini
Arizona State Director
BUREAU OF LAND MANAGEMENT
3022 Federal Building
Room 3047
Phoenix, Arizona 85025

RE; Planet Ranch Land Exchange

Dear Joe:

Please include the following comments in the final environmental statement on the Planet Townsite.

The AWF supports alternative A, No Action, as listed on page 77 of the draft statement. A city of the proposed size would have serious adverse impacts as the statement points out. The benefits from the proposal would not "outweigh" the adverse impacts.

We seriously question the availability of water for the proposed city and feel that this is a limiting factor which has been overlooked. Attempting to furnish water for the needs of 7,000 families would place an unreasonable demand on the Bill Williams River watershed.

Considering the Arizona Department of Economic Planning and Development study of large scale subdivisions, the proposed land exchange should not be authorized. The DEPAD study concluded that Arizona presently has enough subdivided land to meet the projected growth through the year 2000.

Thank you for the opportunity to comment on this proposal.

Sincerely,

Board of Directors
ARIZONA WILDLIFE FEDERATION

by *Richard L. Small*

Richard L. Small
Executive Secretary
ARIZONA WILDLIFE FEDERATION

230

RLS:sly

ATTACHMENT
Joe T. Fallini

Page 2

June 21, 1973

cc: Governor Jack Williams
Representative Morris Udall
Representative Sam Steiger
Mohave County Planning & Zoning
Mohave County Board of Supervisors
Yuma County Board of Supervisors
Arizona State Land Department
Arizona Water Commission

Response to Comments

by

Arizona Wildlife Federation

Comment: Supports alternative of no action. Questions availability of water. Cites DEPAD study indicating there is enough land subdivided in Arizona for projected needs.

Response: Arizona Ranch and Metals Co. have based their water estimates on reports by Turner (Appendix D, Reference #2). The DEPAD study is contained in Appendix G. The revised proposal by AR&M significantly reduces the proposed consumptive use of waters.



ARIZONA WILDLIFE FEDERATION

P.O. Box 1769 • Phoenix, Arizona 85001 • Phone 602-253-4903



October 16, 1973

Mr. Joe T. Fallini, Director
BUREAU OF LAND MANAGEMENT
3022 Federal Building
Phoenix, Arizona 85025

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RE: PLANET RANCH LAND EXCHANGE

Dear Joe:

As a result of an Arizona Ranch and Metals Company presentation on the proposed Planet Ranch land exchange at the October 13, 1973 meeting, the AWF Board of Directors voted unanimously to re-affirm our position of supporting alternative A, page 77, DES 73-18. Please include this letter in the Final Statement.

Our understanding is that the record for comments has been re-opened due to a request from Arizona Ranch and Metals Company, and that the comments from various organizations and individuals were made available for review prior to publication of a final environmental statement. Is this standard administrative procedure or was an exception made in this case?

The final statement should cover the very good possibility that Arizona Ranch and Metals Company would not be the company to develop the proposed townsite should you approve the exchange. Reportedly, McCulloch Corporation has sent Arizona Ranch and Metals a letter of intent to develop the land. What guarantee do you have that the proposed development plan will be adhered to by McCulloch Corporation?

Thank you for re-opening the public record and accepting our additional comments.

Sincerely,

Richard L. Small

Richard L. Small,
Executive Secretary
ARIZONA WILDLIFE FEDERATION

cc: Mohave County Board of Supervisors
Senator Stan Turley
Governor Jack Williams
Department of Economic Planning & Development
Arizona Game & Fish Department

233

Response to Comments

by

Arizona Wildlife Federation

Comment: Was the time for comments extended?

Response: Although no formal extension of time for receipt of comments was made, BLM welcomes any additional information submitted in time to be included in the final statement.

Comment: The final statement should cover the possibility that AR&M would not be the ones to develop the proposed townsite.

Response: See AR&M letter, Appendix F (Ryley, Carlock & Ralston),

Natural Resources Defense Council, Inc.

664 Hamilton Avenue
Palo Alto, California 94301
415 327-1080

New York Office
36 West 44th Street
New York, New York 10036
212 986-8310

Washington Office
1710 N Street, N.W.
Washington, D.C. 20036
202 783-5710

May 30, 1973

Arizona State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Sir:

| | |
|---|--|
| ARIZONA STATE OFFICE BU. LAND MANAGEMENT | |
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Please inform us how many of the environmental impact statements for the Planned Townsite Land Exchange in Mohave County, Arizona, were originally available without charge from your office. We understand that no additional copies are available and find the \$7.25 charge required for obtaining a copy from the National Technical Information Service prohibitively high when considered with the great number of other impact statements which we require.

We strongly urge that in the future a sufficient number of impact statements be available from the BLM without charge to give the public adequate unimpeded opportunity to inform itself of the impacts of proposed agency actions without incurring the relatively substantial charge as well as delay entailed in obtaining impact statements from NTIS. The full disclosure purpose of NEPA is poorly served by imposing financial burdens on the concerned public eager to have the environmental impact statements.

Sincerely yours,

John E. Bryson
John E. Bryson

JEB:gen

cc: Burton Silcock, Director
Bureau of Land Management

Russell E. Train
Chairman
Council on Environmental Quality



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

State Office
3022 Federal Building
Phoenix, Arizona 85025

IN REPLY REFER TO

1792 (910)

June 5, 1973

Mr. John E. Bryson
Natural Resources Defense Council, Inc.
664 Hamilton Avenue
Palo Alto, California 94301

Dear Mr. Bryson:

This acknowledges your letter of May 30, concerning the draft environmental statement for the Planet Ranch Town-site Exchange proposal.

Our printing of the draft statement totalled 300 copies which were widely distributed through the use of a mailing list and in response to individual requests.

To my knowledge your organization has not requested being placed on our mailing list to receive environmental statements. Your letter is being considered as such a request and a copy of our future publications will be sent to your Palo Alto address.

Sincerely,

Joe T. Fallini

State Director



Sandstone Sculpture, Peach Wash, Arizona

SIERRA CLUB *Southwest Office*

2014 East Broadway, Room 212, Tucson, Arizona 85719

May 23, 1973

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Joe Fallini
State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Re: Proposed Exchange of Lands for the Planet Townsite

Dear Mr. Fallini:

My comments are directed primarily to the question of whether or not this proposed exchange is in the public interest. I shall not attempt to critique the adequacy of the environmental impact statement other than to note that a detailed description of the environmental impact of a city of 20,000 or more persons would certainly fill several volumes.

From reading the draft environmental impact statement, it is obvious that the Planet Townsite is nothing more than just another speculative subdivision of which Arizona already has far too many. There is clearly no need for this type of subdivision in Mohave County or anywhere in Arizona. A recent study by the Arizona State Department of Economic Planning and Development showed that existing subdivisions covering 640 acres or more in Mohave County have a population capacity of 544,800 persons. This is far in excess of anyone's population projections for the foreseeable future in Mohave County, and many times greater than the population increase of 23,881 projected by that study for the year 2000.

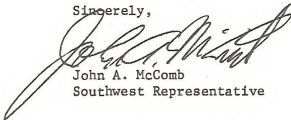
Since there is no need for the proposed development, the question arises as to whether or not the Bureau of Land Management can have any influence on the situation. In my opinion, by denying the proposed exchange, the Bureau of Land Management will significantly decrease the prospect for any subdivision development in the area. At the very minimum, the total amount of area impacted by the subdivision would be less in the absence of the proposed exchanges.

In the event that there is some development activity without the exchanges, this would then increase the value of the public lands sought by the developer, thus making any future exchange more favorable to the federal government and the general public.

Joe Fallini
page two
May 23, 1973

I recognize the desirability of consolidating federal land holdings in order to aid in their administration, however, this consolidation should not be used in such a way as to promote one of the worst land management problems in Arizona today; that of proliferating speculative subdivisions. Hopefully, within the coming decade the State of Arizona and the federal government will enact legislation controlling these activities. In the meantime, I urge that the Bureau of Land Management not be an accessory to the crime.

Sincerely,

A handwritten signature in dark ink, appearing to read "John A. McComb", is written over the typed name and title.

John A. McComb
Southwest Representative

JAM:ab

cc: Margot Garcia
Pat Overby
Rae Pimley

Response to Comments

by

Sierra Club, Southwest Office

Comment: Feel that the proposal is another speculative subdivision and cite DEPAD study concerning subdivisions in Arizona.

Response: The study entitled "Large Scale Remote Subdivisions in Arizona" is contained as Appendix G.

Comment: Denying the exchange would significantly decrease the prospect for subdivision development.

Response: See letter from Ryley, Carlock, and Ralston, Appendix F.

Comment: If development activity occurs without the exchange, the value of the intermingled Federal lands will increase, thus making any future exchange more favorable to the Government and the public.

Response: While it is generally true that values of public lands will increase as a result of residential development on adjacent lands, the same holds true for the private lands being offered for exchange.

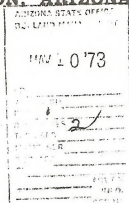


TUCSON AUDUBON SOCIETY

P. O. BOX 3981

TUCSON, ARIZONA 85717

May 5, 1973



State Director, Bureau of Land Management
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Sir:

Thank you for the opportunity to comment on the proposed Planet Townsite land exchange draft environmental impact statement (DES 7318). This action affects an area in Mohave County of particular interest to the Tucson Audubon Society for its present relatively unspoiled wildlife values.

The statement appears to be a relatively accurate and thorough review of the present condition of the area and a fairly complete assessment of the impacts associated with the proposed exchange and its inevitable consequences. On balance, we find the consequences to be undesirable. It appears to us that Arizona Ranch and Metals company (ARM) intends to engage in yet another Arizona land sales scheme, and that the State Land Department and BLM are to be made cooperators in the scheme by making the whole thing possible.

Aside from the relatively obfuscating organization of the document, the weakest area is discussion of alternatives. Our comments relate almost entirely to this defect.

In our judgement, justification of this trade over the alternative of NO ACTION rests on inaccurate assumptions. To begin, on page 77 the statement "ARM has indicated that residential development of the private lands will occur on 10,000 acres even though the exchange is not consummated" appears to be not only unlikely, but a subtle form of blackmail. The enclosed maps indicate that ARM does not own 10,000 reasonably contiguous acres at present. Further, of the area now owned, fully one third falls well within the 100 year flood plain of the Bill Williams river or Casteneda and other washes (p. 14) and is unsuited for development by that fact alone. Apparently ARM cannot develop on anything approaching the 10,000 acre scale without consummating the trade.

To illustrate how ecologically unsound the entire proposal appears to be, consider the consequences of the seemingly innocent intention to build an all-electric community (p. 4). In terms of energy delivered to the site, electricity is about 80% efficient. However it suffers from 60% losses at the generating plant, plus 5 to 10% during transmission, for an overall efficiency of energy utilization near 25%. Gas has small losses in production and transport, and an efficiency approaching 50% in the end use, hence also overall. Thus an all electric community, while in some respects more "convenient", is unconscionably wasteful of our diminishing energy resources.

The Mexican Antelope is rare in Arizona. Indeed, the Chihuahuan subspecies present near Parker and using the Planet townsite area is not contiguous with other U. S. Populations. In general the antelope requires vast open spaces for forage and safety. This remnant population is known to range into the area regularly, albeit intermittently. (p. 19). In view of the tenuous status of this herd, the added people pressure plus loss of migration and forage areas inevitable in the proposed development may be their final push toward oblivion.

There is no doubt that sufficient water is available to support the proposed community (pp. 11, 14, 41, 61). However, the unavoidable degradation of water quality resulting from 10-25% return flows will exacerbate the already very difficult Colorado River water quality problem downstream of the Bill Williams river. Less development would minimize this difficulty. In addition, added pressures on wildlife, including not only Antelope, but also Desert Bighorn Sheep, and riparian dwellers such as the Yuma Clapper Rail and Beaver, will be less with smaller developed areas and populations. In short, in terms of pressure on resources important on one hand to wildlife and the other to downstream farmers, and even Mexican-American relations, the less development the better. The alternative of no exchange has received short shrift, and quite unjustifiably so. The entire discussion of alternatives is vague, and deserves much more meaningful discussion.

Finally, a recent report by the State of Arizona Department of Economic Planning and Development indicated that Arizona already has developed, or at least offered for sale, land in subdivisions, new communities, and innumerable schemes resembling that outlined in this statement, sufficient to accommodate one million MORE people than the projected Arizona population in the year 2000. Clearly Arizona is already over-subdivided. Hence the alternative of no action should receive at least equal weight in the final impact statement. Arizona and the United States cannot afford more schemes like this one. It is not in the public interest for the Bureau of Land Management to consummate the trade.

Sincerely



Dr. Charles Goston
for William Pingry, Conservation Chairman

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Copy to Andrew Bettwy, State Land Commissioner

Response to Comments

by

Tucson Audubon Society

Comment: Do not feel the proposed exchange should be consummated and a town built. Cites reasons as: may eliminate the antelope, an all electric community is not an efficient use of energy, water quality would be lowered, and the DEPAD study.

Response: The townsite area is presently certificated by Citizens Utilities and the latter, rather than Arizona Public Service, may be the electrical utility for the actual development. Sufficient power can be wheeled on the Bureau of Reclamation's 69 KV line from Parker to Bagdad to service the development. The substation located at the junction of Mineral Wash and the Bill Williams River would be adequate for the revised low density development. APS does not believe new transmission lines, other than those from the 69 KV line to a substation inside the townsite, will be needed to handle the development.

Probable impacts on the antelope are discussed in the text.

See text and Appendix J for a discussion on water.

The DEPAD study is contained in Appendix G.

Comment: Questions whether or not Arizona Ranch and Metals Co. could or would actually develop their private lands without the exchange.

Response: See AR&M letter, Appendix F. Although areas within floodplains could not be developed for residential sites, associated urban uses, such as golf courses, could be developed on these areas. The modified 500 homesite proposed development is not contingent upon the exchange. Approximately 400 of the homesites are on private land and could be developed without the exchange.



Student Chapter THE WILDLIFE SOCIETY

UNIVERSITY OF ARIZONA
~~XXXXXXXXXXXXXXXXXXXX~~
92 West State Avenue
Phoenix, Arizona 85021



may 14, 1973

Mr. Joe Fallini, State Director
Bureau of Land Management
230 North 1st Avenue
Phoenix, Arizona 85003

Dear Mr. Fallini:

Having reviewed the draft environmental statement prepared by your office on the proposed Planet Townsite land exchange, please accept the following comments for consideration when preparing the final statement.

The University of Arizona Student Chapter of the Wildlife Society is cognizant of the desirability of blocking up federal lands to eliminate private holdings and thereby facilitate the land ownership pattern and management of such lands.

We feel, however, that the proposed exchange involving 9,646 acres of public lands along the Bill Williams River would not facilitate the management of adjacent lands. With the resulting increases in human impact on the area created by a new city, management would be made more difficult.

we do not feel that the development of the proposed city on the Planet Ranch area is in the best interests of either the area's wildlife resources or the resource management responsibilities of your Bureau.

We recognize that development of some of the private lands could take place even if additional state lands and private lands are not acquired. Any land exchange to block up land in the area would only facilitate unneeded and unnecessary urban development.

The Planning Division of the Arizona Department of Economic Planning and Development compiled in March of this year a preliminary draft report entitled "Large Scale Remote subdivisions in Arizona."

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The most significant conclusions reached by the study were that "more land is now subdivided in the non-urban areas of Arizona than can be developed in the foreseeable future" and that "in many areas damage is done by subdivisions to the natural environment."

DEPAD'S findings further support our assertion that a proposed city at Planet Ranch is not in the best interests of the state of Arizona. If lands were exchanged and a city built, the area residents and developments will have an adverse, disruptive impact on the area's wildlife resources and hinder the Bureau in its management of the total resources of the area.

as outlined in the environmental statement, the only two benefits expected to be accrued for wildlife by the proposed land exchange and city development would be an increase in irrigated pasture providing feed for Canadian geese and the acquisition of riparian habitat by the Bureau for the management of associated wildlife species.

The detrimental effects on wildlife species in the Planet Ranch area resulting from land exchange and city development would be much greater than the two tenuous benefits listed above. The destruction of wildlife habitat, animal displacement, harassment and obstruction to natural animal movements and migrations would be too extensive and too costly to area wildlife populations to be permitted.

In summary, the University of Arizona Student Chapter of the Wildlife Society feels that the proposed land exchange at Planet Ranch would not be in the best interest of the Bureau of Land Management and the area's wildlife resources. A new city in the area will mean more human impact making resource management exceedingly difficult. We respectfully request that the proposed land exchange not be consummated.

Sincerely,

Stephen Williams

Stephen Williams, Chairman
Environmental Quality Committee

SW

cc: Mr. Andrew L. Bettwy

Response to Comments

by

Student Chapter, The Wildlife Society
University of Arizona

Comment: Do not feel the proposal would facilitate management or be in the best interest of wildlife. Do not feel the project is needed, and cites the DEPAD Study of Remote Subdivisions in Arizona.

Response: The study cited is contained in Appendix G. This statement points out that there will be adverse impacts on wildlife if the town is built.

Comment: Request that the proposed exchange not be consummated.

Response: A decision on the proposed exchanges will not be made until after this statement is completed.



Student Chapter
THE WILDLIFE SOCIETY

UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721
SUPO Box 20212



October 16, 1973

Mr. Joseph T. Fallini, State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Mr. Fallini:

Since I did not have a chance to talk with you on Friday when I stopped by to pick up copies of the range inspections for the Kofa that you had prepared for me, I was hoping that you could give me some indication of how the interagency meeting of Wednesday, October 10, went and what agreements or conclusions were reached.

Also, our members would like to reaffirm their opposition to the proposed land exchange at the Planet Ranch townsite.

After hearing Mr. Walter Smith and Mr. Frank Brophy, Jr. at the October 13 board meeting of the Arizona Wildlife Federation, we cannot help but feel that if the land exchange were to be consummated the Arizona Ranch and Metals Company would merely sell the property to liquidate its debts and leave the development to a perhaps unscrupulous company.

Our unaltering tenet remains. If the Planet Ranch area is developed wildlife will suffer by direct loss of habitat and human encroachment. Nearby public lands, affected by increased human impact, will become more difficult to manage.

We would appreciate being advised of any final decision on this matter.

Yours in conservation,

Glen Dickens, President

Stephen Williams
By: Stephen Williams, Chairman
Environmental Quality Committee

GD/sw

ARIZONA STATE OFFICE
BUREAU OF LAND MANAGEMENT

OCT 17 1973

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BY: [initials]
DATE: OCT 17 1973
TIME: 10:00 AM
OFFICE: [initials]
SUPERVISOR: [initials]
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Response to Comments

by

Student Chapter The Wildlife Society
University of Arizona

Comment: Reaffirm position concerning proposed exchange and
townsite development.

Response: This is the second letter from the Student Chapter of The
Wildlife Society, U of A. See comments on letter dated
May 14, 1973, Appendix F.

RECEIVED
JUN 26 1973

BUREAU OF LAND MANAGEMENT
ARIZONA STATE OFFICE

AREA CODE 602
TELEPHONE 258-7701

SUN CITY OFFICE
PLAZA DEL SOL WEST
10771 WEST PEORIA AVENUE
933-5972

LAW OFFICES

RILEY, CARLOCK & RALSTON
114 WEST ADAMS STREET
PHOENIX, ARIZONA 85003

June 25, 1973

FRANCIS J. RILEY
GEORGE READ CARLOCK
JOSEPH P. RALSTON
SAM R. APPLEWHITE, III
JOHN C. ELLINWOOD
FRANK C. BROPHY, JR.
WILLIAM F. WILDER
ROBERT E. GUZIK
W. JOHN LISCHER
RAYMOND M. HUNTER
JAMES D. O'NEIL
CHARLES L. CHESTER

Mr. Joseph Fallini
State Director
Bureau of Land Management
Federal Building
230 North 1st Avenue
Phoenix, Arizona 85003

Re: Draft Environmental Impact Statement,
Planet Ranch (DES 7318)

Dear Mr. Fallini:

On behalf of Arizona Ranch & Metals Co., a Nevada corporation (hereinafter referred to as "ARMCO" or "the Company"), we wish to submit the following comments on the draft Environmental Impact Statement for the Planet Town-site (DES 7318).

1. The Company believes the Draft Statement represents an honest and informed effort to comply with Section 102(C) of the National Environmental Protection Act of 1969 ("NEPA" or "the Act"), given the broad directives of the Act and the limitations imposed by time, space, money and personnel. In view of the present climate of opinion surrounding the administration of public lands and the commercial development of real estate, it is possible that many people will characterize the proposed Federal action as irresponsible and in aid of another speculative land sales promotion. The statement may lend itself to such criticism since there is no mention in it of the many hours and dollars of planning, research, discussions and negotiations that have gone into the proposed exchange and subsequent community development. Commencing early in 1970, the Company, spurred by the necessity of liquidating an oppressive nonproductive indebtedness incurred in the development and operation of the Mineral Hill Mine, began studying the possibility of a rural-urban development of its fee lands and commissioned the A. C. Martin Company of Los Angeles, California, to render a formal proposal. Upon completion, the A. C. Martin proposal was shown to and discussed with Federal and State officials, and after numerous meetings with Federal and State officials and seasoned developers

Mr. Joseph Fallini
June 25, 1973
Page Two

of large land development projects, the present Planet Townsite was evolved and defined. The Company believes the project represents a genuine effort to accommodate the economic feasibility of a private development to the public's interests and needs. Much of the input into the project was arrived at as a result of considerable Federal planning, namely, the Lower Colorado River Land Use Plan promulgated by Interior Secretary Stewart Udall and the continuing Havasu resource area planning of the BLM as well as private studies such as the Samuel Turner Water Report, two A. C. Martin studies and an engineering study by Trico International, Inc.

2. As mentioned, the region in which the proposed Planet Ranch Townsite is located has already been the subject of an intensive land use survey. The Lower Colorado River Land Use Plan comprises an area of 265 miles along the Lower Colorado River from Lake Mead to the Mexican border, at a width of from 20 to 60 miles. In the forward of the Plan, the then Secretary of the Interior, Stewart L. Udall, stated the basic purpose of the Plan:

"The Plan . . . reserves for public outdoor recreation almost 400,000 acres along the most appealing river segment in a region now experiencing the fastest population growth in our Nation."

3. Clearly, the long-range intent of this Plan is to provide all types of facilities for the steadily increasing recreational users which this vast water recreation area will attract. The die was cast for a relatively intensive use of this area when funds for the Lower Colorado River Water Storage Project were first appropriated. Now that it has long been completed, and history has lived up to its expectations, the time has passed in which to try to reverse the pattern of intensive use for which the area is clearly destined. Rather, the present efforts should be concentrated on the intelligent use of these sources for the benefit of vast adjacent populations.

4. Therefore, it would seem incumbent upon the Bureau of Land Management to work toward objectives set forth in the Lower Colorado River Land Use Plan with respect to providing more and better facilities to meet the needs of a rapidly increasing recreational demand for the resources of the area. The proposed exchange would in every way serve

Mr. Joseph Fallini
June 25, 1973
Page Three

this purpose. It is one of the recommended strategies of the Lower Colorado River Land Use Plan:

"That new urbanized areas be established by the Bureau of Land Management in accordance with the Land Use Plan to support the economy and provide services to proposed recreation developments; and that potential urban areas be comprehensively planned to permit growth into economically and sociologically feasible towns of adequate size." (paragraph 16)

5. More specifically, under "Policy Objectives and Guidelines" set forth in the Plan, objective number 10 admonishes the Federal agencies involved:

"To provide for private, residential and organizational facility opportunities by making available planned areas for urbanized private residential occupancy and organization camps outside of the lands planned for park, recreation and wildlife uses."

The Planet Ranch Townsite would seem to fit these criteria perfectly.

6. Availability of potable water is probably the most severely limiting factor in the selection of a townsite in the southwestern deserts. There are virtually no undeveloped river tributaries flowing into the Colorado River in this 265 mile stretch, except for the Bill Williams River. The large underflow of the Bill Williams River at the Planet Townsite assures a more than adequate high quality supply of water even in times of severe drought. If this water is not used beneficially at this point, it is lost to the State of Arizona, even though the right to use the water in Arizona is firmly established.

7. The severe flooding of the Bill Williams River in past years is now largely controlled by the Alamo Dam, 17 miles upstream from the Townsite. The terrain of the proposed Townsite is ideal. It is basically flat and uncut by major washes, except for the Castaneda Wash which can be utilized for greenbelt and other nondwelling purposes. The land slopes gently south toward the Bill Williams River, the

Mr. Joseph Fallini
June 25, 1973
Page Four

floodplain of which will be used for agriculture and thus an additional greenbelt. The site is also well-defined by hills and low mountains on the three sides away from the river. The site does not encroach on any areas set aside for public parks, recreation areas, wildlife refuges or wildlife management areas; yet, it is still in reasonable proximity (about 6 miles) to Lake Havasu and the Parker Strip, a major water recreational area.

8. Any adverse environmental impact of this area by the proposed Townsite should be carefully weighed against the loss to this region of the above-mentioned townsite advantages. There are simply not that many other townsites that meet the requirements set forth in the Land Use Plan, and of the six sites that are listed in the Plan, three are now under development and one has probably been abandoned as not feasible, the new Parker Townsite.

9. With respect to the proposed exchange of private lands owned by the Company in the vicinity of the Havasu National Wildlife Refuge, one of the recommendations of the Land Use Plan has a direct bearing. It states:

"The boundaries of the National Wildlife Refuges (should) be adjusted to add areas of higher wildlife values and exclude areas of lower wildlife values as described in the 'Land Use Plan.'"

If this exchange is not consummated, several parcels of wildlife habitat equal in quality and immediately adjacent to the Havasu National Wildlife Refuge will be lost to this purpose. As has been stated previously, these lands also have the highest economic value of any lands owned by the Company, and it would have no choice but to convert them into their most intensive economic use, should the exchange be denied; unless, of course, the Government deemed the area of such significance as to warrant a legislative appropriation for the purchase of the ranch lands.

10. Throughout the Impact Study much is made of the impact that the exchange and proposed development will have on the region surrounding the Project. However, of equal importance to an assessment of this impact are the trade-offs or gains in favor of the public interest which will be acquired or achieved. The most critical lands in the area from a wildlife standpoint are the riparian lands above the

Mr. Joseph Fallini
June 25, 1973
Page Five

refuge. The Company is offering to surrender title to 2 miles of riparian land, leaving no private holdings intertwined with public lands. The same holds true for the eastern end of the Planet Ranch holdings where the Company proposes to surrender some 4 miles of river channel. In exchange for such critical land areas, the Company is seeking title to lands which will extend approximately 1-1/2 miles north of the present fee lands held by the Company in an area that is best described as desert benchland or plateau. In view of the abundance of such desert lands in the State of Arizona and, in particular, in Mohave County, and the scarcity of riparian lands, the trade-offs would appear to be overwhelmingly in favor of the exchange. Compared to the wildlife activity of the riparian lands, there is relatively little use, either as habitat or for forage purposes, of the desert lands proposed for the Planet Townsite. While some may agonize over the impact of people on these desert lands which will preclude their limited use by an occasional Mexican Pronghorn Antelope or a Big Horn Sheep or a feral burro, the main thrust of such concern is really directed toward the impact of number of people in the general area. Opposition to the Townsite is, in fact, grounded in the belief that mankind and the citizens of Arizona are and will be much better off if human beings are restrained from going into that area east of the Colorado River along the Bill Williams River to a point somewhere on the eastern borders of the Buckskin Mountains in the area of the Alamo Dam, excepting such intrusion only as would be permitted under conditions of a Federally declared wilderness area. The Company submits that there is too much private and State ownership in the area at this time to achieve this goal and that even if it were possible, given the vast expanses of Arizona desert available for just such activity and seclusion, the achievement of such a purpose would serve only the ends of ideology and not the future populations of the State of Arizona. In 1969 the then State Director of the BLM, Fred J. Weiler, advised the Arizona State Land Department that the Federal lands in Township 11 North, Range 16 West were in an area that was not a "key management area" and that it was not necessary "to retain these lands in support of a long-range Federal management program." Mr. Weiler expressed his hope that the State would acquire by the selection process the remaining public lands in that township and advised the State that if it did not, the Bureau would then proceed to classify these lands for "transfer out of Federal ownership under any other appropriate law." In commenting on these sentiments, we would only note that Mr. Weiler enjoyed a

reputation as a keen sportsman and a conservationist as well as a very able public servant.

11. Mohave County, in which the Townsite is located, has had the highest net in-migration rate of any county in the entire United States during the census period 1960-1970, U. S. Bureau of the Census, Current Population Reports, Series P-25, No. 460, June, 1971. Net in-migration for the period was 16,404 persons. Mohave County is the second largest county (areawise) in the State and has the lowest population density (2.0 persons per square mile) of any county. In 1971, approximately 71.7% of this population was rural, but 60% was in or centered around the towns of Kingman, Lake Havasu City and Bullhead City. The private aspect of the proposed exchange involves 5,981 of the approximate 32,336,577 Federal (non-Indian) acres in the State or .00018% thereof, or .00096% of the 6,183,437 Federal (non-Indian) acres in Mohave County, Arizona Statistical Review, September, 1972. The exchange will not significantly increase the approximately 21% of the County's lands that are privately held. A recently issued draft of a study on "Large Scale Remote Subdivisions in Arizona" by the Arizona Department of Economic Planning and Development (DEPAD) notes that Mohave County leads other Arizona counties in land undergoing subdivision with a total of 226,742 acres. Of these 226,742 acres only 14,021 represent new communities or towns such as Lake Havasu City or the proposed Planet Townsite, whereas 127,356 represent mere lot sales where facilities necessary for servicing a dwelling unit are not installed and 45,527 are so-called investment acres or lots of 3-1/3 acres or more lacking similar facilities and deemed to be purchased primarily as investment land for subdivision resale. Only 6,991 acres are located within a high demand recreation area. DEPAD also projects an increase in Mohave County population by the year 2000 of 23,881. It is reasonable to assume that a large percentage of the increase will settle in or near the Colorado River since that is the principal attraction of Mohave County at this time. With the exception of the Bullhead City and Lake Havasu City areas there is insufficient private land suitable for community or new city development along the Colorado River or within its immediate environs in Mohave County. (See Land Status Map compiled by the Lower Colorado River Land Use Plan.) The Parker Strip and Lower Lake Havasu are prime recreational areas, but reasonably accessible private lands suitable for development on the Arizona side of the river are nearly exhausted, while demand therefore continues to grow.

Mr. Joseph Fallini
June 25, 1973
Page Seven

12. On page 55 of the Draft Statement it is mentioned that the proposed new community may be a drain upon the financial resources of Mohave County. While the fiscal problems of county government do not appear to be within the ambit of an environmental impact statement, nevertheless, we recognize that such statements tend, out of an abundance of caution, to become an ominium gatherum of everyone's thoughts about the proposed land exchange and its consequences. There does not appear to be any basis for an inference that the new community would be a drain upon the financial resources of Mohave County. The history of Mohave County for the last decade demonstrates the contrary. During that period the county has seen the creation of a completely new community (Lake Havasu City) and a comparable expansion of what was previously a rather insignificant community (Bullhead City). In the decade since 1962 Mohave County has added a Planning and Zoning Commission with a professional staff, has replaced an inadequate hospital with a modern facility, has initiated a county-wide library system and a television translator service, and has, in general, upgraded all of its services; yet, the increase (\$.48) in its tax rate has been less than that of the counties of Coconino (\$.69), Yuma (\$.78), Maricopa (\$.65) and Pima (\$1.76), Arizona Tax Research Association.

13. In the last paragraph on page 14 of the Draft Statement much is made of floodplain problems within the Townsite area. While we believe that the Alamo Dam has severely curtailed the potential for flood damage in the floodplains adjacent to the main channel of the Bill Williams River, the Federal Government prudentially requires, under Executive Order No. 11296, 31 F.R. 10663, August 11, 1966, the BLM to attach appropriate restrictions upon the use of Federal lands located in floodplains conveyed by it to private interests.

14. In the last paragraph on page 2 the Draft Statement, prior to its enumerations of the various elements of the Company's new community project, cautions that there is no guarantee that the project to be described will be developed if the exchanges are consummated. We feel it would be pertinent to note, in reaction to this statement, that it would be difficult under any circumstances to create iron-clad guarantees that a particular project will be developed where the acquisition of a substantial portion of the land

Mr. Joseph Fallini
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Page Eight

needed for the project is in doubt. The Company has expended such moneys and taken such steps as it believes to be prudent at this time to place itself in a position to carry out the project should the selected lands become available to it. In this connection, the Company has engaged in numerous discussions with McCulloch Properties, Inc., and as a result thereof, the latter has expressed an interest, if and when the selected lands are acquired, in undertaking the development of these lands in substantial accordance with the plan, and in so doing to bond for completion the improvements called for by the plan. McCulloch has reviewed the project and conducted preliminary engineering studies of its feasibility. Further, with respect to guarantees as to quality of development, it should be noted that the Federal Government has little, if any, say in such matters since the ultimate design and development of the community to be located on these lands would be controlled and determined by local governmental authorities. In this connection you should be advised that details of the proposed plan have been submitted to the Mohave County Board of Supervisors and the County Planning Commission for review and comment. It is our understanding that these authorities are generally favorable to the proposed project and have indicated that they will be vitally concerned in its implementation.

15. On pages 41 and 59 of the Statement there is a discussion of the impact of the planned community upon the quality and quantity of water and groundwater. The Company has been advised by competent professional opinion, that given the location of the proposed townsite, the premise that it will be occupied by 7,000 families and that effluent from such occupancy will be recycled and further used for landscaping purposes, the total dissolved solids in the water returned to the groundwater table of the Bill Williams River should contain an average increase of approximately 300 p.p.m. On page 12 of the Draft Statement it is noted that the existing groundwater in the Planet Valley contains total dissolved solids of 271 to 369. If the existing average of total dissolved solids in the groundwater of the Bill Williams River is approximately 300 p.p.m., this would mean that total degradation of water flowing into the Colorado River as a subflow of the Bill Williams River would contain approximately 600 p.p.m. of total dissolved solids. It appears from official records, such as the State

Mr. Joseph Fallini
June 25, 1973
Page Nine

of California publication on water quality designated as California Document No. 3A, that the Colorado River at the site of the Metropolitan Water District Takeout located above Parker Dam contains up to 700 p.p.m. of total dissolved solids. It does not appear, therefore, that the degradation of Colorado River water will equal or exceed that already existing in Lake Havasu. In 1968 the Commission on Water Quality Criteria of the Federal Water Pollution Control Commission published its criteria for drinking water, confirming as acceptable, water containing up to 500 p.p.m. of total dissolved solids. The United States Public Health Service contains the same criteria in its Publication No. 956. Thus, existing supplies of groundwater available to the project are satisfactory in quality. Since it is not contemplated that there will be any need for domestic potable water downstream from the Townsite, the anticipated downstream degradation of the groundwater by the project should not have an adverse impact.

16. On page 22 of the Draft Statement under the heading "A. Bill Williams Mountains" and again on page 52, the impression is left that this area, comprising some 30,000 acres, presently qualifies as a primitive area. While the Company is not fully conversant with the standards for a BLM primitive area, it notes, from ownership and U.S.G.S. topographical maps of the area, that this area contains approximately 10 sections of scattered private lands and a section and one-half of State lands as well as numerous Jeep trails including rather substantial trails the length of Standard Wash and Mohave Wash.

17. In numbered paragraph 2 on page 52 of the Draft Statement there is a discussion of the impact of vehicles on Federal lands adjacent to the proposed townsite. In this connection we believe it would be well to remind readers of the Impact Statement that Federal agencies have authority under Executive Order No. 11644, promulgated February 8, 1972 (37 F.R. 2877) to regulate all off-road activities of such vehicles on Federal lands. In addition, we note that the Draft Statement on page 48, the middle paragraph, expresses the belief that there will be increased harassment of beavers residing in the Bill Williams River in the area of the Narrows in Section 36, Township 11 North, Range 17 West. We would only note in this regard that the proposed road into the project would pass approximately one-quarter of a mile north of the beaver ponds. The location of such a highway should not cause it to be a source of harassment for the beavers.

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June 25, 1973
Page Ten

18. On page 77 of the Draft Statement there is a discussion of alternatives which indicates that development of the Company's private lands would occur if the exchange is not consummated. We would like to emphasize at this time that such possibility is imminent in view of the increasing hardship imposed by the existing indebtedness of the Company. The spur to the development of the Company's lands has been the overhang of a nonproductive indebtedness which has been a drain upon the principals of the Company as far back as 1968.

19. On page 79 of the Draft Statement the alternative of public acquisition of the private and State lands in the area is discussed. We would like to advise the Bureau at this time that based on recent appraisals the Company would give serious consideration to the sale of its fee lands in the area for a cash sum of \$6,000,000 or a sale and an exchange involving cash of \$3,000,000 and a exchange of acceptable lands having an approximate appraised value of \$3,000,000.

20. In the discussion of climate contained on pages 5, 6 and 7 of the Draft Statement, the general impression given is that the Townsite is located in both a low desert zone and a medium-high desert zone. In the interest of accuracy, it should be made clear that the Townsite is in a low desert zone and that, therefore, the facts pertaining to that zone are more relevant to the discussion of the climate of the Townsite. There is also, perhaps, a possibility of confusion in the reader's mind in telling him on page 6 that the average rainfall is 6" per year while the mean annual evaporation is about 80". Clarification could probably be achieved by explaining the effects of such a combination.

21. On page 9 of the Draft Statement mention is made that the highest point in the Townsite is in Section 1 at an elevation of 1,400 feet. As a technical matter, the 1,400 foot elevation in Section 1 is located in Federal lands to be retained by the Federal Government and not exchanged.

22. On page 11 and in Appendix D, Item 2, of the Draft Statement mention should be made of the fact that the Turner Report has been updated by Mr. Paul A. Manera, consulting hydrologist, Phoenix, Arizona, by means of a letter addressed to Trico International, Inc., Scottsdale, Arizona, dated October 13, 1971, a copy of which has been previously furnished to your office.

Mr. Joseph Fallini
June 25, 1973
Page Eleven

23. On page 12 of the Statement there should be included among the enumerated consumptive uses of water at the Planet Ranch those of stock watering and domestic use.

24. In the last paragraph on page 12 of the Statement and elsewhere, reference is made to the "Planet Valley." There does not appear to be any definition of the Planet Valley in the Statement and perhaps it should be explained to the readers that the Planet Valley is basically that portion of the Bill Williams River and adjacent floodplain within Township 11 North, Range 16 West, lying immediately south of the proposed Planet Townsite.

25. On page 49 of the Draft Statement it is noted that the installation of gas and electric power lines would disturb wildlife beyond the confines of the project. The Company does not believe there will be an increase in such disturbance from these sources since natural gas will be installed underground and can be brought to the project along an existing high tension line right-of-way. Power lines have already been extended to the Ranch Headquarters and need only be extended a short distance from their present terminals to the Townsite. Once on the Townsite, power lines will be installed underground.

26. On page 75 of the Statement mention is made of residential development of private properties downstream from the Townsite along the Bill Williams River. To our knowledge ARMCO is the last downstream owner of private property on the Bill Williams River, and it does not plan development of such property if the Townsite lands can be acquired.

27. The following comments pertain primarily to style and organization of information and are intended only to assist the reader in his understanding of the project.

(a) The second sentence of paragraph 1 on page 1 of the EIS should be revised to read as follows:

Arizona Ranch & Metals Co. of Salt Lake City, Utah, and Parker, Arizona, and the Arizona State Land Department have selected for exchange 5,981.10 acres and 3,665.27 acres, respectively, of Federal lands for the purpose of consolidating private and State land holdings and to facilitate Arizona Ranch & Metals Co.'s development

Mr. Joseph Fallini
June 25, 1973
Page Twelve

of a planned community for about 7,000 families on benchlands north of the Bill Williams River in the area presently known as the Planet Ranch (Map 1). The Planet Ranch consists of lands of Arizona Ranch & Metals Co., along and north of the Bill Williams River, in Township 11 North, Range 16 West, and Townships 10 and 11 North, Range 15 West, G&SRB&M. The Company also owns fee lands along the Bill Williams River in Township 11 North, Range 17 West, known as the Middle or Esquerria Ranch (portions of Sections 35 and 36) and the Lower or Kohen Ranch (portions of Sections 27, 28, 29 and 33).

(b) The first sentence on page 2 of the EIS should be modified to read as follows:

Arizona Ranch & Metals Co. is proposing to offer 2,040 acres of their fee lands along the Bill Williams River east and west of the Planet Ranch in exchange for 5,981.10 acres of Federal land located in general on the desert benchlands north of the river in an area where the Company presently holds approximately 4,000 acres of fee lands.

(c) The third, fourth and fifth sentences on page 2 of the EIS should be amended as follows:

The Arizona State Land Department has stated that the State is willing to make available the 4-3/4 sections of State land inside the boundaries of the proposed townsite either by exchange or public sale, and that it wants to retain and acquire a solid block of State land north of the proposed townsite for sale or lease for the benefit of the Common School Trust Fund after development. The School Fund would then benefit by the increased lease or sale value of the State lands. The proposed exchange would improve the Federal land ownership pattern by blocking up Federal lands, and eliminating inter-

Mr. Joseph Fallini
June 25, 1973
Page Thirteen

mingled or isolated Federal, State and private land holdings in the areas as previously recommended by former Arizona State Director, Fred J. Weiler, in 1969.

(d) The fourth sentence of paragraph 1 on page 3 should be amended as follows:

A buffer zone of about 520 acres located in Yuma County south of the proposed community site and the Bill Williams River would not be developed. The Bill Williams River floodplain and the wash bottoms would be preserved as greenbelt and open spaces for ranch and farm activities of the Company.

(e) The third sentence of paragraph 2 on page 3 should be deleted and the following sentence added to paragraph 4 on page 4.

Irrigated pasture in the river floodplains for use in the Company's cattle operation will be increased from 1,100 acres to about 2,000 acres on the Planet Ranch.

(f) The Company believes that Map No. 3 can be improved if the bottom box and legend are eliminated and a cross-hatched design is substituted for the top box. Further, the second legend on Map No. 3 should be corrected to state that the number of acres sought by ARMCO is 5,981.10. The existing cross-hatched box and legend conveys the impression that there is competition between the State and the Company for the lands so marked on the map, when, in fact, there is no such competition.

(g) There might be added to the last sentence on page 14 the following:

. . . and Federal lands to be conveyed in the proposed exchange would contain deed restrictions prohibiting dwellings or other permanent structures from being located in these areas.

Mr. Joseph Fallini
June 25, 1973
Page Fourteen

(h) Under the last paragraph on page 16 and as prefatory to the first sentence thereof, the following statement should be made:

Except for the presence of a high tension power line and service road and a county highway, the townsite is in a virtually undisturbed, natural condition.

(i) The last sentence in the first paragraph on page 17 might be revised to read as follows:

A well-used ranch road connects this road with the Mohave County road that begins at the north side of the Bill Williams River, traverses the townsite from south to north and joins the Mohave County Yucca-Alamo Dam Road.

(j) The first sentence of Paragraph 3 on page 17 might be revised as follows:

Highway construction along the north side of the Bill Williams River from Lake Havasu to Alamo Dam and thence to Highway 93 in the vicinity of Date Creek has been proposed by the Four Corners Regional Commission as part of a proposed effort to create "a better connection between Central Arizona and the Colorado River Zone.

(k) The first sentence of the last paragraph on page 26 should be amended as follows:

An archaeological reconnaissance of the 5,981.10 Federal acres selected in the exchange was made by Prescott College in August, 1972, at the request of Arizona Ranch & Metals Co.

(l) Paragraph 4 on page 55 of the Statement should be revised to read:

Until a municipal government is formed, Mohave County would have to provide the basic governmental services such as police protection, maintenance of a sanitary land fill, planning

Mr. Joseph Fallini
June 25, 1973
Page Fifteen

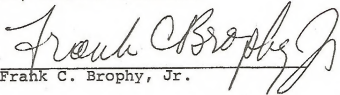
and zoning for the area, issuance of building permits and business licenses and road maintenance of those roads dedicated to the County. The County would also have to provide those other services such as tax assessment, health and welfare facilities and benefits which counties normally provide even in urban areas. School districts, either existing or to be established, would have to provide, maintain and operate schools and school transportation to the new community.

Arizona Ranch & Metals Co. appreciates the opportunity of commenting upon the Draft Statement.

Yours very truly,

RYLEY, CARLOCK & RALSTON

By


Frank C. Brophy, Jr.

FCB:lv

cc: Arizona Ranch & Metals Co.

Response to Comments

by

Arizona Ranch and Metals Co.
(Ryley, Carlock & Ralston)

Comment: Explanation of reasons for proposing to develop town.

Response: None

Comment #s 2, 3, 4, and 5: Refers to the Lower Colorado Land Use Plan published in January 1964.

Response: Figure 11, in this plan indicates that the area presently proposed for a townsite should be managed as a National Cooperative Land and Wildlife Management Area.

Comment: Points out that the Bill Williams River is the only undeveloped river flowing into the Colorado within a 265-mile stretch. There is sufficient water to support the development, and water will be lost to the State of Arizona if it is not used.

Response: See Appendix J

Comment #7: Flooding of Bill Williams River is largely controlled by Alamo dam; the terrain is ideal for a townsite and does not encroach on areas set aside for parks, refuges, etc.

Response: See items 2, 3, 4, and 5 above.

Arizona Ranch and Metals Co., cont'd

Comment #8: Points out that there are not many townsites available meeting the requirements set out in the Lower Colorado Land Use Plan and that environmental impacts should be weighed against loss of this site if it is not developed.

Response: Such a comparison would, in effect, be comparing environmental considerations against economic conditions. Such considerations must be made prior to a final decision concerning the proposed land exchange.

Comment #9: Lower Colorado River Land Use Plan indicates refuge boundaries should be adjusted. If exchange is not consummated, Arizona Ranch and Metals lands that are valuable for refuge purposes will be converted to their most intensive economic use unless purchased by the Government.

Response: This possibility is pointed out in the statement. The revised exchange proposal does not include these lands.

Comment: Presents arguments in favor of the proposed exchange; points out benefits of Government acquiring approximately 2 miles of riparian land and 4 miles of river channel. Indicates that some people feel the area should be a wilderness area and agonize over impact that will preclude bighorn sheep and antelope from using the area.

Response: Map No. 2 shows the lands offered by the altered proposal for exchange by AR&M.

Arizona Ranch and Metals Co., cont'd

Comment #11: Cites figures relating to growth of population in Mohave County which creates a demand for private lands suitable for development. Lists figures from DEPAD study, indicating a projected population increase in Mohave County of 23,881 by the year 2000.

Response: The report mentioned was entitled "Large Scale Remote Subdivisions in Arizona - A Preliminary Draft" dated March 2, 1973. The draft was prepared by the Arizona Department of Economic Planning and Development - Planning Division. The draft indicates that Mohave County presently has 46 subdivisions over 640 acres in size, covering 226,742 acres of private land. (The proposed Planet townsite is not included in these figures.) Table #2 of the draft indicates that the existing subdivisions have a computed population capacity of 544,800. The population of Mohave County is expected to be 54,981 by the year 2000. The study is contained in Appendix G.

Comment #12: Does not feel fiscal problems of Mohave County should be discussed in statement, and points out accomplishments of county.

Response: Possible impacts on the social and economic conditions of the county are discussed in the text.

Comment #13: Points out that Alamo Dam limits potential for flood damage along the main channel of the Bill Williams River, and E.O. 11296 requires BLM to place certain restrictions on lands

Arizona Ranch and Metals Co., cont'd

located in flood plains when they pass from Federal to private ownership.

Response: The Federal lands involved are not within the flood plain of the Bill Williams River.

Comment #14: Points out that it would be difficult for anyone to make iron clad guarantees as to type of development when so much depends on acquisition of land for the project. States that McCulloch Properties Inc. has reviewed the project, conducted preliminary engineering studies, and expressed an interest in undertaking the development of these lands in substantial accordance with the plan. Notes that Federal Government has little, if any, say in such matters since ultimate design and development would be controlled by local governmental authorities. Indicates that County Board of Supervisors and Planning Commission general favor the proposed project.

Response: McCulloch Properties Inc. has had considerable experience with subdivision and development. Their most widely publicized project is probably Lake Havasu City, located approximately 26 air miles northwest of the proposed Planet townsite. By letter dated May 21, 1973, from Mohave County Board of Supervisors (Appendix F), the Board indicated agreement with the proposal.

Arizona Ranch and Metals Co., cont'd

Comment #15: Points out that there should be sufficient water to support the development. Also that degradation of downstream ground-water should not have an adverse impact since there will be no need for domestic potable water downstream.

Response: See last paragraph on page 4 of letter from U.S. Bureau of Reclamation (Appendix F).

Comment #16: Points out that area does not contain the necessary requirements to qualify as a primitive area.

Response: A definition of Primitive Areas appears in subpart 2071.1(b) (1)(v) 43 CFR: "Primitive areas: Extensive natural, wild, and undeveloped areas and settings essentially removed from the effects of civilization. Essential characteristics are that the natural environment has not been disturbed by commercial utilization and that the areas are without mechanized transportation."

The BLM has interpreted the term "mechanized transportation" to mean formally constructed roads. Within this context, the area within the Bill Williams mountains could qualify as a primitive area.

Comment #17: Points out that Federal agencies have authority to regulate off-road vehicle use. Indicates road will be $\frac{1}{2}$ mile from beaver ponds.

Arizona Ranch and Metals Co., cont'd

Response: Text has been revised concerning off-road vehicle use and beaver dams.

Comment #18: Emphasizes that private lands will be developed even if exchange is not consummated.

Response: This is pointed out in the statement.

Comment #19: Indicates company would consider sale of its private lands.

Response: As noted in the text under alternatives, the Bureau of Land Management does not have authority to purchase State or private lands.

Comment #20, 21, 22, 23, and 24: Points out items that are in error or require further clarification.

Response: Text has been revised.

Comment #25: Does not feel that gas and power lines will disturb wildlife.

Response: Disturbance to wildlife would occur during construction.

Comment #26 and 27: Points out errors and suggests areas where clarification would help the reader.

Response: Text and maps have been revised to reflect these items.

FRANCIS J. RYLEY
GEORGE READ CARLOCK
JOSEPH R. RALSTON
SAM P. APPLEWHITE, III
JOHN C. ELLINWOOD
FRANK C. BROPHY, JR.
WILLIAM F. WILDER
ROBERT E. GUZIK
W. JOHN LISCHER
RAYMOND M. HUNTER
JAMES D. O'NEIL
CHARLES L. CHESTER
EDWIN A. HINER

LAW OFFICES
RYLEY, CARLOCK & RALSTON
114 WEST ADAMS STREET
PHOENIX, ARIZONA 85003

AREA CODE 602
TELEPHONE 258-7701

SUN CITY OFFICE
PLAZA DEL SOL WEST
10771 WEST PEORIA AVENUE
933-5972

December 19, 1973

Mr. Renard Okeson
State Director's Office
Bureau of Land Management
230 North First Avenue
Phoenix, Arizona 85025

Re: Planet Ranch Townsite

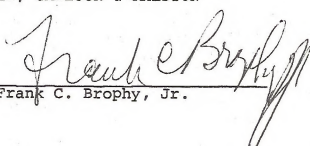
Dear Mr. Okeson:

Enclosed is a copy of a letter from the Arizona Highway Department, Mr. John R. Miller, containing information as to traffic on local highways that would be generated by the Planet Townsite. This information may be helpful in answering some of the inquiries in the comments. If you feel further elaboration is necessary, please advise.

Yours very truly,

RYLEY, CARLOCK & RALSTON

By


Frank C. Brophy, Jr.

FCB:lv
Enclosure

JACK WILLIAMS
GOVERNOR

LEW DAVIS
CHAIRMAN

RUDY E. CAMPBELL
VICE CHAIRMAN

WALTER W. SURRETT
MEMBER

WALTER A. NELSON
MEMBER

LEN W. MATTICE
MEMBER



JUSTIN HERMAN
STATE HIGHWAY DIRECTOR

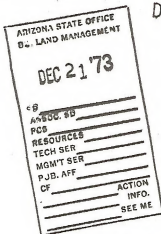
WM. N. PRICE
STATE HIGHWAY ENGINEER

ARIZONA HIGHWAY DEPARTMENT

Phoenix, Arizona 85007

17 December 1973

RECEIVED
DEC 19 1973



Mr. Frank Brophy
Riley, Carlock & Ralston
114 West Adams
Phoenix, Arizona 85003

Dear Mr. Brophy:

Reference is made to your request for the Arizona Highway Department's forecast of traffic volumes that would be generated by a planned development on or in the vicinity of the Planet Ranch near the Bill Williams River.

Traffic studies, for the purpose of analogies, were taken at developments near Roosevelt Lake and at Lake Havasu City. These traffic studies revealed the following data and the results are applied to the proposed development.

For Analogy:

| | |
|----------------------------------|----------------|
| External trips per dwelling unit | 0.72 |
| Persons per dwelling unit | 3.19 (average) |
| Persons per vehicle | 1.47 |
| Vehicles per dwelling unit | 1.15 |

Analogy applied to the proposed development 1995 Forecast:

Assuming a rate of ten (10) dwellings per month for 20 years = 2400 dwelling units.

$2400 \times 3.19 = 7650$ Population

$2400 \times 0.72 = 1750$ (1800) ADT

Planet Ranch Road (50-50 Turning Movement) = 1800 ADT
State 95 = 3100 ADT

State 95 at its present junction with the Planet Ranch Road, with the additional traffic volume from the proposed development, would not require a higher type design than that in place at the present time.

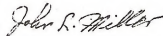
Mr. Frank Brophy
17 December 1973
Page 2

(See attached turning movement diagram).

Should a more in depth be required or other information needed,
please advise.

Very truly yours,

CHAS. L. SMITH, Jr.
Planning Survey Engineer



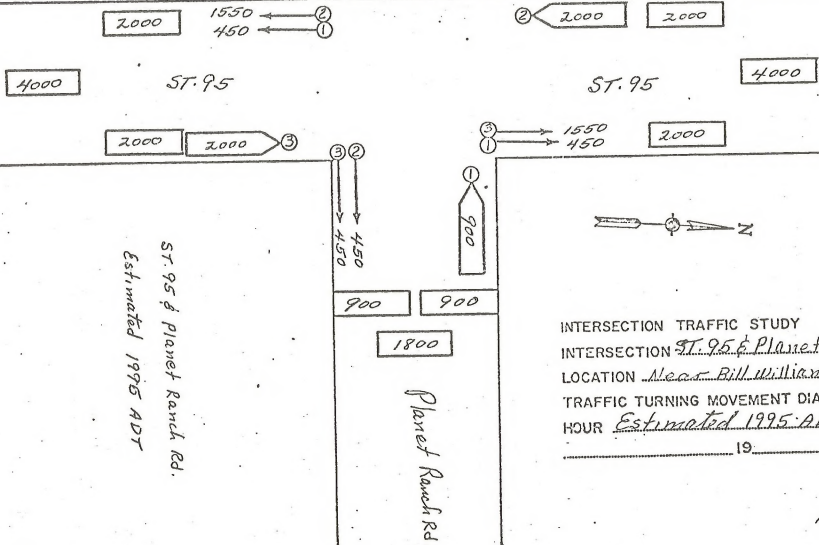
JOHN R. MILLER
Transportation Planner
Forecast Section

JRM/sjn

attachments

TURNING MOVEMENT DIAGRAM ("T")

272



INTERSECTION TRAFFIC STUDY
 INTERSECTION ST. 95 & Planet Ranch Rd.
 LOCATION Near Bill Williams River
 TRAFFIC TURNING MOVEMENT DIAGRAM
 HOUR Estimated 1995 ADT
 _____ 19 _____

12/17/73

Response to Comments

by

Arizona Highway Department

Comment: Offers information concerning the impact that development of Planet townsite would have on State 95.

Response: This concerns only the access to and from State 95 and it is still reasonable to assume that safety requirements would necessitate rebuilding the majority of the county road from State 95 to Planet Ranch.

Dear Mr. Fallini:

As a land owner in Mohave County I am for the development of a new town at the Planet Ranch.

I feel Mohave County is large enough to support a new satellite City along the river of Lake Havasu City.

Phoenix is growing too fast & becoming too congested for all concerned.

If there is to be a public hearing on it I would like to attend.

Sincerely

959-4985 Dick Capra 274

Lake HAVASU
 Acres

Response to Comments

by

Dick Capra

Comment: Expresses support for development and feels that Mohave County is large enough to support another town.

Response: The study contained in Appendix G indicates that there are 46 subdivisions in Mohave County with a capacity of 544,800 people.

AFFILIATED GYNECOLOGISTS, LTD.

923 EAST McDOWELL ROAD • PHOENIX, ARIZONA 85008 • TELEPHONE 254-5843

CHARLES VAN EPPS, M.D.
ROBERT E. JONES, M.D.
WILLIAM D. LAWRENCE, M.D.
NORMAN B. BROWN, M.D.
ALAN JACK MESSINGER, M.D.
M. JOHN PEACHEY, JR., M.D.
DALLAS R. DEMMITT, M.S.W.
FAMILY COUNSELOR

May 15, 1973

Bureau of Land Management
3022 Federal Building
230 N. First Avenue
Phoenix, Arizona 85025

Dear Sirs:

I have recently read about what may happen in the Planet Ranch area in Western Arizona. I am awell acquainted with this Ranch, having been a friend of the foreman there for many years. I believe there is certainly enough beautiful areas in Arizona already under development for the number of people that we have in the foreseeable future and would hate to see another spotty area of development right in the middle of one of the best wild life areas in the Southwest.

I would strongly urge that there be no "people" development in this area.

Yours very truly,



WILLIAM D. LAWRENCE, M.D.

WDL:kg

| | |
|----------------------|---|
| ARIZONA STATE OFFICE | |
| B- LAND MANAGEMENT | |
| MAY 16 1973 | |
| SP | 1 |
| ASSOC. SD | 2 |
| PCS | 3 |
| RESOURCES | 4 |
| TECH SER | 5 |
| MGMT SER | |
| P.J.R. AFF | |
| CF | |
| ACTION | |
| INFO. | |
| SEE ME | |

Response to Comments

by

William D. Lawrence, M.D.

Comment: Urges that there be no "people" development in this area, and feels that Arizona has sufficient land now available for development.

Response: Appendix G contains a study of lands presently subdivided in Arizona. AR&M feels that the kind of development they are proposing would have sufficient demand to justify their expenditure of development funds.

| | |
|----------------------|--------|
| ARIZONA STATE OFFICE | |
| BUL. LAND MANAGEMENT | |
| JUN 18 1973 | |
| TO | |
| ASSOC. SO | |
| PCS | |
| RESOURCES | |
| TECH SER | |
| WOMT SER | |
| P.J.R. AFF | |
| CF | |
| | ACTION |
| | INFO. |
| | SEE ME |

June 15, 1973

State Director's Office
Bureau of Land Management
U.S. Department of Interior
3022 Federal Bldg.
230 N. First Avenue
Phoenix, Arizona 85025

Dear Sir:

I am advised that the Bureau is presently considering a trade to the Planet Ranch in Western Arizona for the development of a townsite.

Having visited the area some fifteen years ago, I cannot imagine a more remote or unlikely spot for a town. I would hate to see such an area developed if it meant a threat to bighorn sheep or other endemic species in the area.

Would you please mail a copy of the environmental impact statement for this project in order that I may better evaluate the present situation.

Thank you.

Tracy Stair

Tracy Stair
518 Muriel Place
Tucson, Arizona 85704

Response to Comments

by

Tracy Stair

Comment: Does not want area developed if it would threaten
wildlife.

Response: The statement points out that the proposed development
would have significant adverse impacts on wildlife.

LARGE SCALE REMOTE SUBDIVISIONS IN ARIZONA

A Preliminary Draft

Prepared By

Arizona Department of
Economic Planning and Development

Planning Division

March 2, 1973

LARGE SCALE REMOTE SUBDIVISIONS IN ARIZONA

Introduction

The State of Arizona continues to attract many thousands of new residents each year. From an estimated 1972 population of 1,925,000 people, Arizona's population is expected to reach 4,431,000 by the year 2000--an increase of 2,506,000 residents in the next 28 years.

Approximately 80% of Arizona's residents live in its urban areas and the bulk of the future population increase is expected to occur in and around its two largest cities. By the year 2000 it is expected that almost 2,000,000 more people will move into the Maricopa County-Phoenix, and the Pima County-Tucson urban areas.

In addition to the predicted population growth around Phoenix and Tucson, there has been considerable land subdividing in geographic areas that are relatively remote from urban centers. There is little documentation available concerning the statewide impact of remote subdivisions. It is not yet known to what extent the large amount of remote subdivision activity will alter Arizona's expected urban and rural growth patterns. The potential effect of these remote subdivisions on Arizona's natural environment and economic growth needs to be studied.

The Department of Economic Planning and Development has completed a preliminary survey of 182 large scale remote subdivision in Arizona. This paper is a summary of the survey and is the first step in an effort to examine and analyze one possible component of future urban expansion.

Definitions

For purposes of this study, the following definitions were used:

Subdivision: The division of land into four or more lots for the purpose of sale.

Large Scale: 640 acres or more.

Remote: Not a logical extension of an existing urban area.

Outside of the three mile jurisdiction of incorporated areas.*

Types of Remote Subdivisions

Five types of subdivisions were identified in the preliminary study.

The categories were defined on the basis of lot size and/or availability of basic facilities necessary for servicing a dwelling unit. Placement of each subdivision within a category was generally made by the county planners assisting with the data collection.

Homesites: The basic facilities necessary for servicing a dwelling unit have been installed.

Lot size does not exceed 3 1/3 acres.

Recreational: Located within a high demand recreation area.

The basic facilities necessary for servicing a permanent or second home have been installed.

Lot size does not exceed 3 1/3 acres.

*Several subdivisions located within the three mile limit of an incorporated area were included because they were not considered to be a logical extension of an existing developed urban area.

Lot Sales: The basic facilities necessary for servicing a dwelling unit are not installed.

Lot size does not exceed 3 1/3 acres.

Investment: The basic facilities necessary for servicing a dwelling unit are not installed:

Lot size is 3 1/3 acres or more.

Lots are sold to purchaser whose apparent intent is to re-sell later at a profit.

New Town: Relatively independent, self-contained planned community.

Large enough to support a range of housing types and to provide employment opportunity within its boundaries.

A balanced range of social and cultural opportunities is provided by the development plan.

Basic facilities necessary for servicing a dwelling unit are installed. Proportions of industrial, commercial, residential, public facilities, and open space areas are specified in the planning process.

Extent of Subdivision Activity

Table #1 shows the extent of the large scale remote subdivision activity in Arizona. Mohave County contains the largest number of subdivisions (46) followed by Cochise County (30) and Maricopa County (26). Mohave County contains the most land undergoing subdivision with a total of over 226,000 acres. Yavapai County contains the second largest amount with over 161,000 acres. Approximately 80% of the statewide total of remote subdivided acreage is found in the "lot

ARIZONA'S REMOTE SUBDIVISIONS
BY LAND AREA AND SUBDIVISION TYPE

| County | No. of Subdivisions Included In Study | Total Acres | Homesites | | Recreation | | Lot Sales | | Investment | | New Town | |
|------------|--|----------------|-----------|---------|------------|--------|-----------|---------|------------|---------|----------|--------|
| | | | No. | Acres | No. | Acres | No. | Acres | No. | Acres | No. | Acres |
| Apache | 7 | 53,930 | | | | | 7 | 53,930 | | | | |
| Cochise | 30 | 116,357 | 5 | 19,600 | | | 22 | 78,610 | 2 | 2,130 | 1 | 6,017 |
| Coconino | 14 | 83,085 | 1 | 2,000 | 4 | 3,757 | 4 | 18,385 | 5 | 58,943 | | |
| Gila | N* | -N- | | | | | | | | | | |
| Graham | N* | -N- | | | | | | | | | | |
| Greenlee | N* | -N- | | | | | | | | | | |
| Maricopa | 26 | 118,248 | 23 | 89,448 | | | 1 | 19,200 | | | 2 | 9,600 |
| Mohave | 46 | 226,742 | 5 | 32,847 | 3 | 6,991 | 23 | 127,356 | 13 | 45,527 | 2 | 14,021 |
| Navajo | 11 | 38,297 | | | | | 8 | 18,530 | 3 | 19,767 | | |
| Pima | 15 | 83,529 | | | | | 6 | 59,216 | 7 | 17,098 | 2 | 7,214 |
| Pinal | 8 | 35,400 | 1 | 5,000 | | | 4 | 17,740 | 2 | 9,140 | 1 | 3,820 |
| Santa Cruz | 6 | 98,000 | | | | | 4 | 94,700 | 2 | 3,300 | | |
| Yavapai | 15 | 161,427 | 2 | 14,000 | | | 13 | 147,427 | | | | |
| Yuma | 4 | 11,388 | | | | | 3 | 5,500 | 1 | 5,888 | | |
| TOTAL | 182 | 1,016,402 | 37 | 162,895 | 7 | 10,748 | 95 | 640,594 | 35 | 161,793 | 8 | 40,372 |

* No information available.

sales" and "investment" categories. These are the categories which do not have the basic facilities necessary for servicing a dwelling unit. Three counties were not included in the totals because they do not contain any large scale remote subdivisions, primarily due to the large percent of the land which is in public ownership.

Comparison of Subdivisions
with Incorporated Communities

As seen in Table #1, over 1,016,402 acres of private lands in remote areas are being subdivided. If smaller subdivisions were included, this total acreage figure would be much larger. Translating the acreage of the large scale subdivisions into square miles and comparing it to the incorporated areas in Arizona, yields the following information:

| | Area (Square Miles) | Percent of Private Lands in Arizona |
|---------------------|------------------------|---|
| Remote Subdivisions | 1,588 | 9.13 |
| Incorporated Areas | 947 | 5.44 |
| Total | 2,535 | 14.57 |

It is apparent that considerably more land is being subdivided outside of Arizona's incorporated cities and towns than is contained within the incorporated city limits. It is also likely that even more of Arizona's privately owned remote lands will be subdivided in the near future.

Population Projections and Subdivision Impact

Table #2 displays current population statistics and compares them with projected population figures. For purposes of the study, it was

ARIZONA POPULATION PROJECTIONS AND
POTENTIAL SUBDIVISION IMPACT

| | 1970 Census of Population | 1972 AESC Estimate | ATOM 2000 Projections ¹ | Population Increase Projected | No. of Subdivisions Included in Study ² | Computed Population Capacity of Subdivisions ³ |
|------------|---------------------------------|--------------------------|--|-------------------------------------|---|--|
| Apache | 32,304 | 33,500 | 78,750 | 45,250 | 7 | 79,900 |
| Cochise | 61,918 | 66,500 | 112,428 | 45,928 | 30 | 527,400 |
| Coconino | 48,326 | 50,000 | 72,777 | 22,777 | 14 | 117,200 |
| Gila | 28,255 | 32,000 | 75,831 | 43,831 | 0 | -0- |
| Graham | 16,578 | 17,700 | 26,456 | 8,756 | 0 | -0- |
| Greenlee | 10,300 | 10,600 | 28,759 | 18,159 | 0 | -0- |
| Maricopa | 969,425 | 1,058,000 | 2,531,520 | 1,473,520 | 26 | 556,800 |
| Mohave | 25,857 | 31,100 | 54,981 | 23,881 | 46 | 544,800 |
| Navajo | 47,559 | 50,300 | 113,385 | 63,085 | 11 | 63,300 |
| Pima | 351,667 | 382,000 | 902,786 | 520,786 | 15 | 453,400 |
| Pinal | 68,579 | 73,500 | 140,000 | 66,500 | 8 | 178,300 |
| Santa Cruz | 13,966 | 14,600 | 39,340 | 24,740 | 6 | 212,800 |
| Yavapai | 36,837 | 38,200 | 74,960 | 36,760 | 15 | 739,700 |
| Yuma | 60,827 | 67,000 | 158,115 | 91,115 | 4 | 30,100 |
| TOTAL | 1,773,428 | 1,925,000 | 4,431,383 | 2,506,383 | 182 | 3,503,700 |

¹Source, Arizona Trade Off Model, FCRC.

²Includes only those subdivisions over 640 acres which are defined within the text.

³An average family size of 4.04 persons (as determined by the 1970 Census) was applied to known lot counts; where lot counts were not known estimates were made from published literature or by local planning officials.

assumed that one family would occupy one lot. An average family size of 4.04 persons was applied to the lot counts or estimates. This was done to determine an estimated population capacity for each subdivision.

The population capacity for the 182 subdivisions included in the study was computed to be 3,503,700 persons. This is 997,700 more people than are expected to be added to Arizona's current population by the year 2000. If it can be assumed for a moment that there will be no further growth of Arizona's cities and towns and that the 182 subdivisions will be fully occupied by the year 2000, it becomes apparent that more land is being subdivided than will be needed to accommodate new population by the year 2000.

It must be emphasized that the 997,700 excess subdivision population capacity estimate is a conservative figure for it assumes there will be no further growth of the Phoenix and Tucson metropolitan areas. As has been mentioned above, these areas are expected to increase by a combined total of 2,000,000 people by the year 2000. An estimate of the population capacity of the urban areas will be prepared by the Planning Division.

Additional Framework and Assumptions

The preliminary survey was designed to reveal the magnitude of remote subdividing activity. Because of its very preliminary nature, it was necessary to make a number of assumptions that need examination. First, it was assumed that all lands approved for subdivision will actually be subdivided. In addition, it was assumed the subdivisions could eventually be

supplied with necessary support facilities and resources (such as water). If, however, these assumptions are valid as many subdividers advertise, disturbing questions are raised regarding the trends in use of subdivided lands and the impact on taxpayers for providing services to these lands.

More data are needed on the specifics of the subdividing activity. The assumptions and data need to be placed in a framework with studies of growth potentials for the incorporated areas, second home developments, and a survey of the uses subdivided land buyers intend to make of their property.

Preliminary Conclusions

This summary has been prepared to document the extent of one type of land use activity, remote subdividing. The extent of environmental damage that may result from subdividing has not been measured objectively, although the preliminary survey did find evidence of environmental damage. It cannot be concluded that all subdividing should cease. It is apparent, however, that the scale of remote subdividing activity is large enough to warrant serious consideration by legislators, the State executive agencies and county supervisors and planners. If this consideration reveals threats to human health and safety, endangerment of natural processes, or extensive threats to important plant and animal

communities, then it is the responsibility of state officials to take action to prevent desecration of the quality of life that Arizonans enjoy.

The preliminary conclusions of the study can be stated as follows:

1. More land is now subdivided in the non-urban areas of Arizona than can be developed in the foreseeable future.
2. Under present circumstances even more remote land is likely to be subdivided.
3. Most of the land in the remote subdivisions is sold without the improvements and facilities necessary for construction of residences.
4. Many discrepancies exist between promises and performance by the subdividers.
5. The lack of support facilities creates serious problems for the people who actually do construct homes in the subdivisions.
6. In many areas damage is done by the subdivisions to the natural environment.
7. A current lack of data and information prohibits the complete assessment of the total impact of remote subdivisions on the environment of Arizona.

Recommendations

1. The state should further address itself to the issue of the effect of large scale subdivisions on the development of Arizona and the quality of its environment.
2. The state's role should be defined within a comprehensive statewide land use planning process.
3. The statewide land use planning process should be designed to involve relevant state agencies, units of local government, federal agencies, and the public.

September 11, 1972

RECEIVED
SEP 14 1972

Mr. Barry Cushing
Resources Division
Bureau of Land Management
Phoenix, Arizona

PHOENIX DISTRICT OFFICE



PRESCOTT COLLEGE

archaeological survey

Dear Mr. Cushing:

Enclosed please find the Preliminary Report of the archaeological reconnaissance requested by the Arizona Ranch and Metals Company. The company officials were extremely cooperative, giving their time freely. They conducted the survey party on a tour of the area indicating landmarks and section corners and generally familiarizing the party with the project area. Without their kind cooperation and assistance the project would have been more difficult and costly.

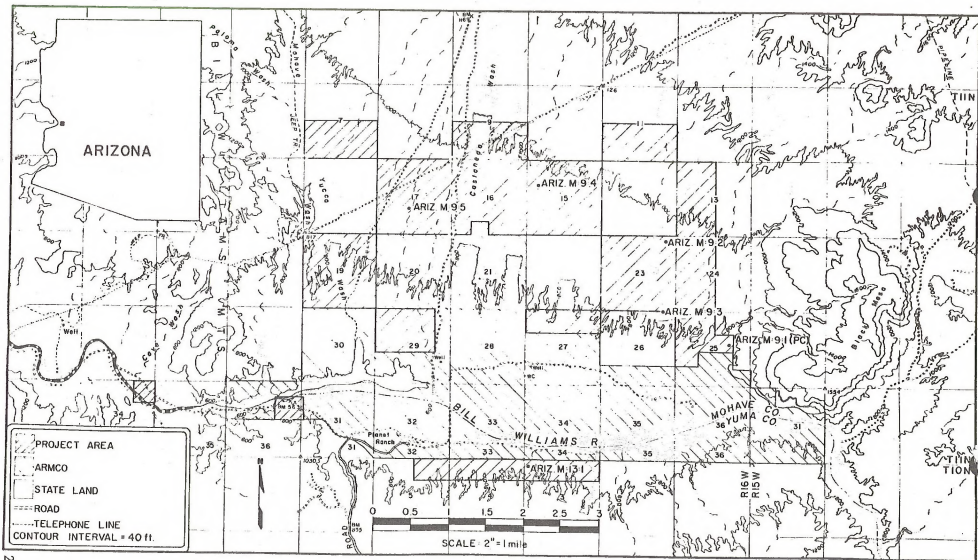
I have followed the Guidelines for the Preparation of Statements of Environmental Impact on Archaeological Resources prepared by the Arizona Archaeological Center of the National Park Service.

Please feel free to contact me if there are any questions pertaining to the reconnaissance or report.

Sincerely,


Paul V. Long, Jr.

cc: Frank Brophy, Jr.
Walter Smith
Arizona State Museum
Douglas H. Scoville



PRESCOTT COLLEGE ARCHAEOLOGICAL SURVEY OF
ARIZONA RANCH AND METALS CO. EXCHANGE LANDS

A Preliminary Report

At the request of Frank C. Brophy, Jr., Attorney for the Arizona Ranch and Metals Company (ARMCO), the Prescott College Archaeological Survey undertook an archaeological reconnaissance of 8 1/2 sections of federal land in Mohave and Yuma Counties, Arizona. The aforementioned land is soon to be released from Bureau of Land Management control. The area under evaluation is located primarily in Township 11 North, Range 16 West, north of the Bill Williams River, Yuma County, Arizona. Two 40 acre parcels, Township 11 North, Range 17 West, NE 1/4 of NE 1/4 of Section 34 and SE 1/4 of the NE 1/4 of Section 36, also are included in the study area. The survey was under the administrative direction of Dr. George J. Gumerman, Director, Archaeological Survey, Prescott College, Arizona. The actual field reconnaissance was conducted by Paul V. Long, Jr. with the able assistance of Peter Sherman, both of Prescott College.

The project was started on August 8, 1972 and concluded on August 22. The entire survey was conducted on foot, except for the use of a four-wheel drive vehicle to gain access to survey areas not readily accessible from existing roads. A zig zag pattern was used to traverse the larger alluvial terraces while the smaller areas were crisscrossed from end to end. Survey collections were made from the entire area. Where definable prehistoric habitations or workshops were located,

material cultural items were left so as to insure systematic collection when the time came.

The success of the project was aided by the splendid cooperation of Walter Smith, assistant to the President of ARMCO who took time from his busy schedule to conduct us on a tour of the area under consideration, showing us land marks and section corners which helped us in our efforts. Without his invaluable assistance the time and cost of the reconnaissance would have been considerably more.

A total of six prehistoric sites were located during the survey. Two are sleeping circle sites, two are lithic workshops, and two are stone alignments.

Conclusion

Inasmuch as the land on which these prehistoric sites are found will be altered to some extent by construction, farming activities and constant use by recreationally oriented inhabitants, it is of utmost importance that further investigations be made. Secondly, the particular cultural features located by the survey team have never been reported for the Bill Williams area although Rogers (1966:24) indicates the possible existence of the San Dieguito Complex in this area. The nearest recorded sites are along Signal Wash in McCracken Basin and in Rawhide Canyon (Rogers 1966:173,176) both some distance northeast of the area under discussion. Of the four sites listed by Rogers (1966:173) and the two by Davis, Brott and Weide (1969:67-69) none records architecture or rock alignments. These facts suggest the need for the further investigations herein suggested.

Recommendations and estimated time for additional work follows by site.

Ariz. M:9:1 (PC)

This site is located 3/4 of a mile north of the end of a ranch road which parallels the north side of the Bill Williams River in Mohave County, Arizona. Three sleeping circles lie along the edge of a boulder-strewn alluvial terrace extending from the eastern base of Black Mesa, on the east side of a large open mesa and sandy-bottomed rincon.

The terrace rises 10 meters above the bottom of the rincon and is being slowly eroded by a small arroyo at its base. The site is within a 40 acre parcel which eventually will be used for agricultural plots.

Life Zone: Lower Sonoran.

Site Components and Artifacts: This site encompassed an area 100 meters long and 20 meters wide along the edge of an alluvial terrace and consisted of three and possibly five sleeping circles which are indicative of the San Dieguito Complex. A cursory surface inspection yielded no artifactual material.

Conclusion: It is doubtful that excavation of this site would yield anything more conclusive than the surface remains already shown. However, in order to increase the data on these human remains it is advisable to measure all circles, map them in relation to each other, and determine the relationship between the building boulders and the desert pavement on which they rest. It should also be noted as mentioned above that there is a lack of data pertaining to such sleeping circles in reports dealing with this part of Arizona. In this regard, they are unique to the area.

Ariz. M:9:2 (PC)

This site is located on a high point of land in the NE 1/4 of Section 23, 2 1/4 miles north of a ranch road paralleling the Bill Williams River. The high point appears as 995 on the USGS Quad. The site is easily accessible by four-wheel drive vehicle via a large arroyo approximately 1/4 mile west of the site. The area surrounding the site consists of deeply dissected alluvial terrace with a sparse covering of creosote brush. The larger arroyos are flat, broad plains with moderately heavy vegetation.

Life Zone: Lower Sonoran.

Site Components and Artifacts: This small lithic area is 15 meters in diameter. Depth is minimal. Bedrock outcrops all over the site. Scattered over the surface are numerous pieces of siliceous rock some of human manufacture and even more created by natural circumstances. Several stone tools were collected.

Conclusions: Although a few lithic artifacts were recovered from the surface, excavation is not feasible for the reason mentioned above.

Ariz. M:9:3 (PC)

Ariz. M:9:3 is located 3 miles north of the Bill Williams River in the SE 1/4 of the NW 1/4 of Section 45, T11N, R16W, on top of a small hill marked 985 on Castaneda Hills Quad. A powerline road passes the area about 1 1/4 miles north.

Life Zone: Lower Sonoran. Creosote (Larrea tridentata) and cholla (Opuntia bigelovii) dominate the plant community on the site while in arroyos, which bracket the site, ironwood (Olneya tesota) and Palo Verde

(Cercidium microphyllum) are the most obvious.

Site Components and Artifacts: The site is approximately 20 meters in diameter with lithic debris scattered over the surface. The recognizable stone tools, choppers and flake knives, were left in situ. The surficial material is siliceous stone and malapai.

Conclusions: Even though there is only a meager collection of stone tools observed on the site, in total numbers, there are more here than any other site recorded by the survey. It is for this reason, that the tools were left on the site so that they could be collected systematically at a later date.

Ariz. M:9:4 (PC)

The second sleeping circle site is situated on a broad flat between two small arroyos in the NW 1/4 of the SE 1/4 of Section 17, T11N, R16W. The nearest access road is 1/4 of a mile north. A long broken north-south ridge is situated about 1/8 of a mile east from Ariz. M:9:4. The Planet Ranch-Yucca Road is 1/2 a mile east of the site.

Life Zone: Lower Sonoran.

Site Component and Artifacts: Two adjacent sleeping circles are the only manifestations of human habitation at this site. The circles are constructed of large boulders which are not as heavily patinated as those at Ariz. M:9:1. The circles are 4 and 3 meters in diameter and lie 1 meter apart. In the northern most circle are three smaller boulders placed in the center of the circle. They appear as though they were either hearth stones or a vessel support.

Several of the boulders are barely observable above the surface, others

extend more than three-quarters above ground level, while the remaining rest on the surface. A small amount of lithic waste was observed.

Conclusions: The area in which this site is situated will, if plans proceed for the area, be the downtown section of the development. Although tools are lacking, 100 meters north of the site a chopper was recovered. Previous experience with the excavation of sleeping circles (Hayden, personal communication) suggests that little would be gained by excavation of these circles; however, it is recommended that the circles be measured, mapped, and photographed. Sleeping circles are one of the manifestations of the San Dieguito Complex.

Ariz. M:9:5 (PC)

A foot trail passes next to this site which is located in the SE 1/4 of the SE 1/4 of Section 23, R16W, T11N. A ranch road leading to the rincon is 1 1/2 miles south of the site. The terrace on which the rock alignment is situated is bounded on the west by a small arroyo and on the east by rolling alluvial terraces.

Life Zone: Lower Sonoran.

Site Components and Artifacts: Ariz. M:9:5 consists of two rows of boulders 5 meters long adjacent to a trail. A quartz crystal hammerstone was collected a short distance north of this rock alignment. No other evidence of human activity was recorded in the vicinity of the site.

Conclusions: Excavation is not recommended because of the lack of artifactual material and the relatively sterile nature of the area around the alignment, however, the alignment should be mapped, measured and photographed. The relationship between the boulders and the surface

should be checked. Similar alignments are found throughout the southern California desert region and are assigned to the San Dieguito Complex.

Ariz. M:13:1 (PC)

The second rock alignment recorded by the survey is located on a small erosional remnant in a large arroyo 1 1/4 miles east of Planet Ranch and on the south side of the Bill Williams River in the NW 1/4 of the NW 1/4 of Section 3, R16W, T10N.

Life Zone: Lower Sonoran.

Site Components and Artifacts: This site is composed of two parallel rows of boulders 30 meters long. The southern most 20 meters is disturbed and out of line but not so much so that it is unidentifiable. The interior width is 90 cm. and the exterior width is 115 cm. Artifactual material is lacking. Sites similar to this one have been categorized as representative of the San Dieguito Complex.

Conclusions: Other than checking the calcification of the boulders that make up the alignment, mapping, measuring and photographing, no further investigations or excavations are recommended for this site.

Vegetation List

The area under consideration lies in the Lower Sonoran life zone. The predominant plant in this area of the Sonoran Desert is the creosote (Larrea tridentata). The following list of plants are the most abundant types and easiest to recognize.

palo verde (Cercidium microphyllum)
creosote (Larrea tridentata)
ironwood (Olneya tesota)
sajualo (Cercus giganteus)

bisnaga (Echinocactus acanthodes)
cholla (Opuntia bigelovii)
beavertail (O. basilaris)

The vegetation in the west portion of the project area is denser with palo verde and cholla being the more dominant.

Evaluation of Significance

The historical significance of four of the sites (Ariz. M:9:1, M:9:4, M:9:5, and M:13:1) recorded during the survey is related to the fact that sites such as these (rock alignments and sleeping circles) are for the first time recorded in this particular area. I would be well to mention also that this area never has been the subject of an intensive archaeological reconnaissance and therefore such features could probably be located. At the present time, however, they are unique for this area. Throughout San Bernardino County, California and Yuma County, Arizona such manifestations of the San Dieguito Complex have been recorded so that the presence of these features in the project area is not a totally new occurrence in the surrounding regions.

Let it be stated here, that when one talks of scientific significance it must be done in degrees, with the knowledge that much of the Southwest is still archaeologically virgin territory. With this in mind, the project area under consideration must be considered of moderate importance. The general paucity of sites, the extremely scattered nature of the artifactual evidence, and the lack of ceramic material that might indicate an extended use of this area through time; all of these, when analyzed, seem to support the foregoing statement. It is not as though sleeping circles and rock alignments were confined only to the project area and were lacking in all

other adjacent areas, since throughout Yuma County and into Maricopa County evidence for the San Dieguito Complex has been reported (Rogers 1966: 173-177). The desert areas of California and the southern coastal regions, particularly from Oceanside southward to San Diego, abound with evidence of the San Dieguito Complex (Rogers 1966).

Variety is another consideration which is quite interesting inasmuch as there are four and perhaps five types of remains assignable to human endeavor: trails (?), circles with and without boulder rimmed perimeters, parallel rock alignments, and lithic workshops.

In conclusion, while it is possible that these sites may add something new to the knowledge of the San Dieguito Complex, it is not probable, since more than 8,000 sleeping circles were recorded by Rogers (1966:77) until his census attempts were discontinued in 1943.

The measurement, photographic recording, and accurate location of these features should give adequate information to the archaeologist for any future research.

The Predicted Effect of the Action on Archaeological Resources

Once the land in question has been cleared for exchange, it will be developed into a recreational community. Much of the land will be prepared for building sites, some will be developed into farming plots while other segments will be used for recreational purposes such as horseback riding trails, dune buggy areas, some game hunting, and rock hunting. Conceivably, the entire area will receive direct and indirect effects. The sleeping circles in the "downtown" area will undoubtedly be destroyed unless they are incorporated into a proposed park for the area, while the

circles in the rincon area will probably have the boulders robbed for building stone. In this case, there will be adverse effects on all or part of the resources. The recommendations herein made will mitigate some of the adverse effects.

A Recommended Program for Mitigation of Adverse Effects on the Resources

It is certain that the six sites recorded by the survey in the project area will come under adverse effects as a result of the proposed action. However, these effects will be mitigated if the following recommendations are implemented.

Ariz. M:9:1 (PC)

Three sleeping circles. Check relationship between boulders and desert pavement, measure, map, and photography.

Estimated time: 2 days.

Ariz. M:9:2 (PC)

No work is proposed for this site.

Ariz. M:9:3 (PC)

Lithic workshop. Establish 2 meter grid over site and collect and bag each square separately for analysis. Check relationship between desert pavement and tools. Measure variable depths, if any, and collect accordingly.

Estimated time: 2 days.

Ariz. M:9:4 (PC)

Two sleeping circles. Check relationship between desert pavement, measure, map, and photography.

Estimated time: 1 day.

Ariz. M:13:1 (PC)

Rock alignment. Check relationship between desert pavement and boulders, measure, map, and photography.

Estimated time: 1 day.

The above recommendations are made so that all information available from the sites may be collected and subsequently added to the growing inventory of manifestations of the San Dieguito Complex along the eastern frontier of this complex. What little that might be gained could serve as the base for future studies of this early lithic tradition.

Cost Estimate

| | |
|--|------------|
| Supervisory Archaeologist (\$50 per day for 7 days) | \$ 350 |
| Assistant Archaeologist (\$30 per day for 7 days) | 280 |
| Report Writing (\$50 per day for 3 days) | 150 |
| Laboratory Analysis (\$25 per day for 7 days) | <u>175</u> |
| | 955 |
| 12% insurance, taxes, etc. | 114 |
| Per diem while in field (2) 7 days \$10 per day | 140 |
| Field supplies, fil, forms, drafting paper, etc. \$10 per day for 7 days | 70 |
| Laboratory supplies, photo printing, map drafting \$10 per day for 7 days | 70 |
| Mileage at 15¢ per mile (4-wheel drive vehicle for 1,000 miles) | <u>150</u> |
| | 1,499 |
| Indirect administrative expenses 20% of total | <u>400</u> |
| | \$1,899 |

Adverse Unavoidable Effects

Although archaeological studies are planned which will alleviate some of the negative effects of the proposed action, there is always unavoidable destruction of archaeological resources. However, those resources which will be destroyed are not necessarily that valuable to the researcher. They are not the only examples and therefore not so unique that their destruction would create a void in the archaeological record.

Alternatives to Proposed Action

Two alternatives to the proposed action can be made. The first has been dealt with and concerns mitigating measures using scientific study. The recommendations for this alternative appears above along with estimated cost for this action. The second alternative concerns the protective management of the two sleeping circles in the "downtown" section of the development. It would be feasible to do this and would certainly be an addition to the proposed park.

The Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

The archaeological resources which are to be affected by the proposed action are few in number although the variety is great for such a small area. Above it has been stated that within the culture province of the San Dieguito Complex more than 8,000 sleeping circles and a large number of rock alignments have been recorded so that it is doubtful that the lose of these will create any hardships on present or future archaeological investigations.

List of References

- Davis, E. L., C. W. Brott and D. L. Weide
1969 The Western Lithic Co-Tradition. San Diego Museum Papers
No. 6. San Diego Museum of Man. San Diego.
- Pourade, Richard F. (ed.)
1966 Ancient Hunters of the Far West. Union-Tribune Publishing
Co., San Diego.

SUMMARY OF LAND TRANSACTIONS IN
TOWNSHIP 11 N., R. 16 W., GSRM,
1967 to date

1967 - 1968

State of Arizona selected the odd numbered sections in T. 11 N., R. 16 W. because BLM owned the surface and mineral rights on these sections. The State did not select the odd numbered sections in this township because the surface rights on these lands had been reacquired by BLM from the railroad and the railroad retained the mineral rights. After considerable deliberation, we agreed to approve these State selections which "recheckerboarded" this township because:

- (1) BLM did not need to retain and manage these lands, and
- (2) State selections are a high priority application.

1962-Present

The Arizona Ranch & Metals Co. and BSF&W have been encouraging BLM to make a land exchange to acquire the NE $\frac{1}{4}$ of Section 29, T. 11 N., R. 17 W., which is valuable wildlife habitat and suitable for addition to the Havasu National Wildlife Refuge.

This desire to acquire this 160 acres grew into a larger exchange proposal by the Arizona Ranch & Metals Company who offered additional lands in the Bill Williams River Valley area east and west of Planet Ranch in exchange for the odd numbered BLM sections in T. 11 N., R. 16 W.

Simultaneously, Arizona Ranch & Metals Co. proposed to purchase the even numbered State sections in T. 11 N., R. 16 W., from the State Land Department.

1972

On May 10, 1972, after several meetings between Arizona Ranch & Metals Co., BLM, and State Land Department representatives, the State Land Department filed State Exchange A-6951 for 3,665 acres in the northern half of T. 11 N., R. 16 W. The State has offered scattered State sections in Mohave County within areas which BLM wants to block out for multiple use management. The State's purpose is to obtain lands on the periphery of the proposed Arizona Ranch & Metals Co. new town development for future sale to benefit the State Trust Fund. The Arizona Ranch & Metals Co. is precluded by the regulations from filing a private exchange application on the remaining public lands in the central and southern portions of this township because a private exchange application cannot be filed until and unless the public lands are classified for exchange. State Exchanges are not precluded by the more restrictive regulations against private exchange filings.

4-27-72

BLM published in the Federal Register a "Notice of Proposed Classification of Public Lands for Transfer Out of Federal Ownership" (copy attached). The "Notice of Classification" has not been published and will not be published until the environmental statement is completed and a decision is made as to whether or not these lands should be classified for disposal by exchange.

GEORGE E. LEONARD
CHAIRMAN
JOHN S. HOOPES
VICE-CHAIRMAN
WESLEY E. STEINER
EXECUTIVE DIRECTOR
AND
STATE WATER ENGINEER



Arizona Water Commission

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MARSHALL HUMPHREY

January 31, 1974

Mr. Joseph T. Fallini
State Director
Bureau of Land Management
3022 Federal Building
Phoenix, Arizona 85025

Dear Mr. Fallini:

| | |
|---|--------|
| ARIZONA STATE OFFICE BU. LAND MANAGEMENT | |
| FEB 1 '74 | |
| SD | _____ |
| ASSOC. SD | _____ |
| PCS | _____ |
| RESOURCES | _____ |
| TECH SER | _____ |
| MGMT SER | _____ |
| PUB. AFF | _____ |
| CP | _____ |
| _____ | ACTION |
| _____ | INFO. |
| _____ | SEE ME |

On December 13, 1973 Reinard Okeson and Robert Steele of the Bureau, and Philip Briggs of the Commission met, at our respective requests, to discuss the water supply aspects of the proposed Planet Ranch land exchange. Messrs Okeson and Steele discussed the Bureau's work to date, the study upon which it is based, and requested the Commission's counsel during the preparation of the final environmental impact statement.

The adequacy of the water supply for the proposed subdivision, and the impact of these uses on the downstream riparian areas had been questioned during the review of the draft EIS. The Bureau desires to respond to these questions to the extent possible in the final EIS, but is constrained to working with available information. The applicant for the exchange provided a copy of a study that had been conducted for them in 1962 by Samuel F. Turner and Associates; this study plus stream gage records on the Bill Williams River in the vicinity of the Ranch form the basis for their evaluation.

Mr. Briggs noted that the Commission had itself commented on these aspects of the draft, and would similarly review the final statement. Additionally the Commission is required to review the adequacy of water supplies for subdivisions in Arizona under ARS 45-513 and thus would eventually become directly involved in assessing the availability of water supply. The Commission's review under ARS 45-513 is more intensive than that under preparation for

Mr. Joseph T. Fallini
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January 31, 1974

the final EIS, however, Mr. Briggs did agree to assist the Bureau in a review of the available information. The following are the results of that review.

The Planet Valley of the Bill Williams River is relatively small, and forms only a part of the proposed exchange. The aquifers in the Valley are, however, the proposed source of water for the entire tract. The Valley is a widening of the canyon of the Bill Williams. Castaneda Wash joins the river from the north in the Valley, as do smaller washes from the south. The Valley's aquifers are the shallow, relatively young alluvium, deposited in recent times by the river, and an underlying older conglomerate. The aquifers are recharged principally by the river and discharge naturally through evapotranspiration, drainage as underflow and surface flow at the downstream end, and artificially by pumpage. The volume of water in storage, the natural discharge and the amount and variation of recharge are all important aspects in the determination of adequacy of supply.

The Turner report was prepared to determine the water supply available in Planet Valley for a proposed expansion of irrigation on the Ranch, and it of course does not include the impact of Alamo Dam on the river regimen. Probably due to its intended purpose, the report treats lightly some of the key elements of an adequacy study for a subdivision. Alfalfa can stand a few water short years, a community can not. The report's limited treatment of the volume of water in storage in the aquifers and of the transient nature of the groundwater in storage, and failure to consider the dynamic temporal aspects of the surface water--groundwater interrelationships render it unsatisfactory for the problem at hand. Combined with the probable significant impacts of Alamo Dam on the streamflow regimen in the Valley during dry years it is the Commission's judgement that the available information does not demonstrate adequacy of supply for the subdivision, nor can it be used to do so. Conversely, analysis of the report does not indicate the supply is inadequate.

Should the Bureau wish to pursue this matter further we would suggest additional data collection to supplement the Turner report, and updating of the streamflow analysis to include the modifications required by the construction of Alamo Dam.

Mr. Joseph T. Fallini
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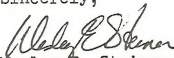
Requisite data would include:

1. Survey of phreatophytes currently growing in the Valley and in the reach to Alamo.
2. Determination of surface water--groundwater interrelationships.
3. Water levels in the Valley.
4. Aerial and vertical extent of the aquifers.
5. Well tests to better determine aquifer characteristics and their distribution.

Once these data are gathered, a classical surface water supply analysis should be conducted, using the above data to include conjunctive operation of the surface and groundwater supplies. There is definitely a water supply available in the Valley. The question is how much, and how to develop it.. The above program, if satisfactorily conducted, will provide those answers.

Please contact us if we can be of any further assistance.

Sincerely,

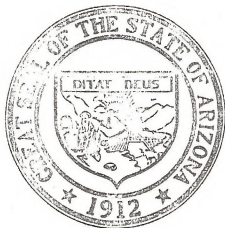

Wesley E. Steiner
Executive Director

ENGINEERING BULLETIN NO. 12

THE SEPTIC TANK
A METHOD OF SEWAGE DISPOSAL FOR
PRIVATE OR PUBLIC BUILDINGS

ENVIRONMENTAL HEALTH SERVICES

ARIZONA STATE DEPARTMENT OF HEALTH



PART I - GENERAL CONSIDERATIONS

A. APPROVAL REQUIRED

1. Design and Installation - Each septic tank disposal system shall be designed and installed so as to meet the approval of the local county health department.
2. Septic Tanks Excluded - Septic tanks will not be approved nor shall septic tanks be installed under the following conditions:
 - a. Where connection to a public sewerage system is practicable.
 - b. Where soil conditions or topography is such that a septic tank system cannot be expected to work satisfactorily.
 - c. Where installation of such a system would constitute a potential hazard to a ground water supply.
 - d. In a planned community or large subdivision where a considerable number of buildings will be served. In such cases, when connection to an existing system is not practicable, a community sewerage system will be required, along with sewage treatment facilities, satisfactory to the Arizona State Department of Health.

B. SUITABILITY OF SOIL

1. General - Before designing any septic tank system it must first be determined that soil conditions are suitable for absorption of the septic tank effluent. The soil shall have an acceptable percolation rate without interference from ground water or impervious strata below the level of the absorption system.
2. Site Conditions - Unless the conditions noted below are met, the site selected is considered unsuitable for subsurface disposal systems and the construction of residences or other structures requiring waste disposal facilities will be prohibited unless an alternate method of sewage disposal satisfactory to the department of health is provided.
 - a. The percolation time shall be within the limits specified in Table I below.
 - b. Rock formations or other impervious strata and the maximum elevation of the ground water table shall be at a depth greater than 4 feet below the bottom of each tile trench or seepage pit.
3. Borings - To determine subsurface formations in a given area it may be necessary that subsurface explorations be made, although useful information can sometimes be obtained from road cuts, stream beds and building excavations. The depth to which borings shall be taken is dependent upon the type

of leaching system proposed. For subsurface tile fields, the borings shall be made to a depth of 10 ft. and for seepage pits to a depth of at least 30 ft. Since subsoil strata may vary widely within short distances, additional borings at the site of the proposed system may be necessary at the discretion of the local health department.

4. Percolation Tests - When subsurface conditions are satisfactory and the soil appears suitable, percolation tests are required at points and elevations typical of the area in accordance with recommendations of the county health department. All tests shall be conducted at the owner's expense, by or under the supervision of an engineer, sanitarian, or other qualified person, and results shall be submitted to the local health department for review and decision as to the suitability of the area for septic tank disposal systems. It is extremely important that only qualified personnel conduct percolation tests as the results obtained will determine not only the acceptability of the site but also the design of the subsurface disposal system.

TABLE I
ABSORPTION AREA REQUIREMENTS AND
ALLOWABLE RATE OF APPLICATION BASED ON PERCOLATION TESTS

| Percolation Rate (Time in minutes required for water to fall 1 inch) | Required Absorption Area in sq.ft. per bedroom (see 1, 2, 3 below) | Maximum Rate of Application gallons per sq.ft. per day (see 2, 3, 6, 7 below) |
|--|--|---|
| 1 or less | 70 | 5.0 |
| 2 | 85 | 3.5 |
| 3 | 100 | 2.9 |
| 4 | 115 | 2.5 |
| 5 | 125 | 2.2 |
| 10 | 165 | 1.6 |
| 15 | 190 | 1.3 |
| 30 (4 below) | 250 | 0.9 |
| 45 | 300 | 0.8 |
| 60 (5 below) | 350 | 0.6 |

1. Sufficient area shall be provided for at least 2 bedrooms.
2. Absorption area for trenches is figured as trench-bottom area.
3. Absorption area for seepage pits is effective side-wall area below the inlet.
4. Over 30 minutes unsuitable for seepage pits.
5. Over 60 minutes unsuitable for leaching systems.
6. Quantity of sewage to be determined from Table III.
7. No provisions made for automatic washing machines or garbage grinders, for buildings where these appliances are installed, the calculated leaching area should be increased 20% for automatic washing machines, 40% for garbage grinders, and 60% for both.



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